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## INTRODUCTION

The Bureau of Land Management's (BLM) Monticello and Moab, Utah, Field Offices (FO) currently manage approximately 4.4 million acres of public lands and resources in both San Juan and Grand County, Utah. The Monticello FO (2.5 million acres) is contained entirely within San Juan County. The Moab FO (1.8 million acres) is located primarily in Grand and San Juan Counties, with a small portion located in Emery County, Utah. Other agencies that manage resources in the area include the U.S. Forest Service (USFS), the National Park Service (NPS), the U.S. Fish and Wildlife Service (USFWS), the Utah Division of Wildlife Resources (UDWR), the Bureau of Indian Affairs (BIA), Utah State Parks, the Utah Division of Forestry, Fire, and the State Institutional and Trust Lands Association (SITLA).

A Special Evaluation Report, completed in August 2001, determined that the San Juan Resource Management Plan (RMP) (1991), which currently directs the use of public lands under the jurisdiction of the Monticello FO, is no longer providing effective guidance for the management issues now facing the Monticello FO. In May 2002, a Special Evaluation Report determined that the Grand RMP (1985) which currently directs the use of public land under the jurisdiction of the Moab FO was inadequate as well. RMP revisions guiding the use on public lands for the next 15 years are currently being developed.

To satisfy the requirements of the Federal regulations at 43 CFR 1610.2 of the Federal Land Policy and Management Act (FLPMA) and 40 CFR 1501.7 of the National Environmental Policy Act (NEPA) for public involvement, the Monticello and Moab FOs initiated the scoping process. This process began with the publication of a Notice of Intent (NOI) to plan in the Federal Register on June 4, 2003.

#### 1.0 SCOPING/ISSUES

Public scoping is a process designed to meet public involvement requirements of FLPMA and NEPA. The cooperative process includes soliciting input from interested agencies, organizations, and individuals on issues, concerns, needs, and resource use, development, and protection opportunities.

The scoping period began on June 4, 2003, and ended on January 31, 2004. Scoping included scheduled open houses in 6 communities, a "Comment Cruiser" which visited 12 locations, a website, and an invitation for the public to provide written comments. This report describes the scoping process, identifies the planning issues derived from the comments, and provides some analysis of the information received. Comments received from the public were placed in one of three categories:

- Issues to be addressed in the plan;
- \* Issues addressed through other policy or administrative action; or
- Issues beyond the scope of the plan.

The information obtained is used to define the relevant issues that will be resolved in a broad range of alternative management actions. The environmental impacts of these alternatives will be addressed in a Draft Environmental Impact Statement (DEIS) made available for public review. The process is an excellent method to open dialogue with the general public about management of the public lands and for the agency to evaluate the concerns of those who have an interest in the area.

# 1.1 ISSUES IDENTIFIED BY THE PUBLIC TO BE ADDRESSED IN THE RESOURCE MANAGEMENT PLAN

<u>Issue 1.</u> How can increased recreation use, especially motorized vehicle use, be managed while protecting natural resource values? Recreation in southeastern Utah has grown in popularity in recent years. With popularity comes demand for a variety of recreation opportunities including OHV use, climbing, mountain biking, hiking, camping, base jumping, and equestrian use, to name a few. With the number of visitors growing, recreation is expanding further into the backcountry, while resource and user conflicts are becoming more common. OHV use needs to be managed, including identifying areas to be restricted or closed for the protection of other resource values.

- Which areas should be designated as open, limited or closed to OHV use, and which routes should be designated within the limited category?
- What types of recreation travel should be available on designated routes and under what limitations?
- \* Where could adaptive management be applied in response to unacceptable resource impacts?
- \* How should recreational uses be managed to limit conflicts with other recreational users?
- \* How should camping, human waste, fires, and wood collection be managed?
- \* Where should special recreation management areas (SRMAs) be designated?
- \* How should conflicts with other resource uses be reduced?

- What management actions should be implemented to mitigate damage caused by recreational uses, including vehicles, on other resources and sensitive areas, especially riparian areas?
- \* How should recreation in the planning area be managed to ensure public health and safety?
- \* Where and under what circumstances should permitted recreation uses be available?
- What types of recreational facilities and uses should be available, and what limitations should be required?
- \* Where can the recreation opportunity spectrum (ROS) be applied?
- ❖ How will areas be managed for visual resources?

<u>Issue 2</u>. What areas will be available for mineral development, and what restrictions will be imposed? Historically, wages within the mineral industry were higher than most other wages; thus, an important aspect of the local economy. Mineral development can potentially affect other resources. Projected trends for energy and mineral development will consider historical data. Energy and mineral development will be analyzed in the context of the need for protection of other resources.

#### Related Issues:

- \* How can conflicts be reduced between mineral development and increasing recreation?
- \* Where can mineral development occur while protecting other resources?

<u>Issue 3.</u> What areas should have special designations such as areas of critical environmental concern (ACECs) and wild and scenic rivers (WSRs)? FLPMA and BLM policy require the BLM to give priority to designation and protection of ACECs during the land use planning process. The Wild and Scenic River Act directs federal agencies to consider the potential for including water courses into the National Wild and Scenic River system during the land use planning process.

## Related Issues:

- \* What management prescriptions will be applied to areas with special designations?
- \* What resources need the protection of special designations?
- Should existing special designations be modified?

<u>Issue 4.</u> How can resources such as watershed, wildlife, and vegetation be protected, maintained, or restored? Resource uses (grazing, mineral development, OHV use, and recreation) can affect the natural function and condition of the watershed. Vegetation is the base for many uses on public lands. Plant communities provide habitat for wildlife as well as forage for domestic animals. A healthy cover of perennial vegetation stabilizes the soil, increases infiltration of precipitation, prevents runoff, provides clean water to adjacent streams, and minimizes noxious weed invasion.

- What watersheds may require special protection?
- What water sources are not meeting water quality standards and how can water quality be improved?

- What restrictions could be placed on resource uses in identified areas to maintain the existence, promote the recovery, or prevent the listing of threatened and endangered species?
- How should wildlife corridors and unfragmented and critical wildlife habitat be protected or improved?
- ❖ How should relict plant communities and hanging gardens be managed?
- \* How should vegetation be allocated to provide forage for grazing animals and wildlife?
- \* What areas should be available for fuelwood harvesting?
- \* Where and with what appropriate methods can noxious weeds be eradicated?
- \* How should activities and uses be managed during drought?

<u>Issue 5.</u> Are there areas where grazing should not be available due to resource conflicts? The Secretary of the Interior, through the BLM, manages approximately 264 million acres of public rangelands throughout the western United States. The Taylor Grazing Act of 1934, the Federal Land Policy and Management Act of 1976, and the Public Rangelands Improvement Act of 1978 guide BLM's management of livestock grazing on public lands. The objectives for grazing administration regulations are to "promote healthy sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning condition; to efficiently and effectively administer domestic livestock grazing; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands" (43 CFR 4100.0-2).

## Related Issues:

- How should grazing be managed during times of drought?
- \* Are there areas where class or numbers of livestock should be changed?
- \* Are there specific allotments where management practices should be changed?
- How should grazing be managed in riparian areas?

<u>Issue 6.</u> How can riparian/wetland areas be managed to protect, maintain, and restore their proper functioning condition? Riparian areas support a unique mixture of trees and shrubs, providing vital habitat for wildlife, aquatic species, and plants. Both the density and diversity of plant and wildlife species is normally higher in riparian areas than on adjacent uplands. Healthy riparian areas also reduce the impact of flooding, filter sediment, stabilize banks, store water and recharge groundwater during floods and rainstorms. These areas can also filter sediment and nutrients from surface run-off from adjacent lands. Resource uses such as grazing, mineral development, recreation, and OHV use can affect the natural function and condition of riparian.

- \* How should riparian systems be managed to maintain or improve the quality of habitat for fish, wildlife (especially migratory birds), plants, and invertebrates?
- \* How should activities and uses be managed to protect riparian areas?

<u>Issue 7.</u> How can cultural resources be protected from the predicted influx in visitation as well as impacts from other resource uses (recreation, grazing, mineral development, etc...)? Moab and Monticello are both known for their high density of cultural resources, many of which have yet to be documented or recorded. For Native Americans, these resources provide a direct link to their past, and they request that these resources be protected.

## Related Issues:

- \* What management practices (i.e. timing, method of development, and location) can be applied to activities and uses in order to protect cultural resources?
- Where can cultural resources be used for scientific, educational, recreational and traditional purposes?

<u>Issue 8.</u> What lands within the planning area should be identified as targets for acquisition, disposal or withdrawal? As mandated by Sec. 106 (a)(1) of FLPMA (43 USC 1701), public lands are retained in federal ownership, the exception being those public lands that have future potential for disposal (i.e., sale and exchange), as described under Sec. 203(a) and Sec. 206 of FLPMA (43 USC 1713; 1716). Public lands have potential for disposal when they are isolated and/or difficult to manage. Lands identified for disposal must meet public objectives, such as community expansion and economic development. The preferred method of disposal is land exchange. Other lands can be considered for disposal on a case-by-case basis. Disposal actions are usually in response to public request or application that results in a title transfer, wherein the lands leave the public domain. Public land cannot be effectively administered without legal and physical access. Methods used to acquire legal rights that meet resource management needs include negotiated purchase, donation, exchange, and condemnation. A withdrawal means withholding an area of public land from settlement, sale, location, or entry for the purpose of limiting activities in order to maintain other public values.

<u>Issue 9.</u> Where is fire desired or not desired, and in what areas could fire be utilized as a management tool for vegetative treatments? Drought and beetle infestation in southern Utah has caused hazardous fuel loading, increasing the threat of wildfires. Areas of pinyon die-off and dry grasslands have created areas of higher risk for fire hazard, and could require treatment. A fire management plan will be developed that addresses high-risk areas, fire prevention, prescribed burns, rehabilitation and restoration, hazardous fuels reduction, and the protection of life and property.

- \* Where will fire be utilized to eradicate noxious weeds and invasive species?
- ❖ Where should the natural fire regime be reestablished?
- \* What developed areas should be protected from wildland fire?
- \* What post-fire restoration practices are acceptable?

## 1.2 ISSUES ADDRESSED THROUGH POLICY OR ADMINISTRATIVE ACTIONS

Policy or administrative actions include those actions that are implemented by the BLM as a standard operating procedure, because law requires them, or because they are the policy of the BLM. Administrative actions do not require a planning decision to implement. The following issues can be addressed by administrative actions:

- \* Compliance with existing laws and policies (FLPMA, NEPA, Endangered Species Act, American Antiquities Act, Clean Air Act, National Historic Preservation Act, etc.).
- \* Education, enforcement/prosecution, vandalism, and volunteer coordination.
- \* Consistency with existing federal, state, and local plans.
- Management of cultural resources that includes up to date inventories, non-disclosure of sensitive sites, proposed cultural sites for the National Register of Historic Places, and Native American consultation.
- Management of existing Wilderness Study Areas (WSAs) under the Interim Management Policy (IMP).
- ❖ Complete inventory of riparian and wetland areas. Use monitoring to help protect these resources.
- \* Recreation management improvements including a comprehensive signage system and maps.
- \* Administration of existing leases, permits, and other authorized uses.
- Valid existing rights.
- Monitoring wildlife and biodiversity.
- Monitoring air quality.
- \* Mitigation measures for site-specific projects.
- \* Controlling noxious weeds.
- Making rangeland and wildlife improvements.
- \* Establishing utilization levels to maintain rangeland health.
- Eligibility standards for specially designated areas.
- Protection of threatened, endangered, or sensitive species.
- \* Coordination with local, state, and federal agencies.
- Cooperation with user groups.
- Analysis of impacts (including socio-economics) are not part of the Plan and are considered in the DEIS.

## 1.3 ISSUES BEYOND THE SCOPE OF THE PLAN

Issues beyond the scope of the plan include all issues not related to decisions that would occur as a result of this planning process. In short, they include decisions that are not under the jurisdiction of the Moab and Monticello FOs or are beyond the capability of the BLM to resolve as part of the planning process. Issues identified in this category are as follows:

- \* Settlement of RS 2477 claims.
- New wilderness proposals.
- \* Eliminating grazing, mineral development, and OHV use on all public lands.
- \* Activities and uses beyond the jurisdiction of the BLM.

- Changing existing laws, policies, and regulations.
- \* Availability of funding and personnel for managing programs.
- Considering alternative energy sources as substitutes for activities related to mineral development.

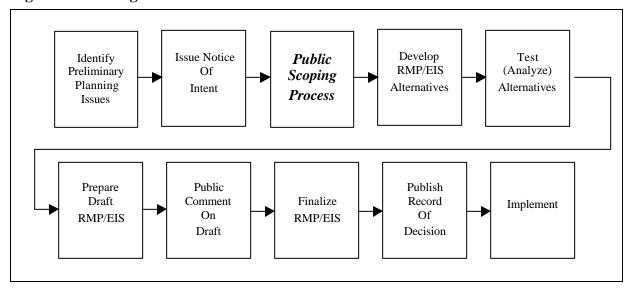
#### **1.4 DATA**

Several groups submitted separate data on various resource issues, wilderness proposals, etc. These groups include SUWA, The Nature Conservancy, Sierra Club, Southeast Utah Land Users, Wild Utah Project, The Utah Shared Access Alliance, The Western Watershed Project and Red Rocks 4 Wheelers. All data submitted has been collected and will be considered during the alternative development and impact analysis processes.

## 2.0 SOLICITATION AND COMPILATION OF PUBLIC COMMENTS

The scoping process began June 4, 2003, with the publication of the NOI in the Federal Register. The public scoping period ended January 31, 2004 after being extended a month. Comments received after January 31, 2004, will be considered in the alternative development process, but are not included in this report. Interested individuals, organizations, federal, state and local agencies, as well as affected Native American Tribes were also invited to submit comments to the BLM. Figure 1 indicates where Public Scoping is within the planning process.

**Figure 1. Planning Process** 



In January 2003, a public participation plan was developed for this RMP effort. The public participation plan contained tactics to draw dialogue from stakeholders representing a cross section of viewpoints rather than from polarized points of view. The plan incorporated elements that ensured that all voices would be heard rather than only the voices of a dominant few. It

emphasized bringing individuals together to share opinions and ideas. The implementation of the public participation plan resulted in an array of comments. The rest of this section addresses those comments.

## 2.1 PUBLIC SCOPING

As the public participation plan was developed, five major challenges faced the planning team during scooping:

- \* Creating public interest in attending the scoping meetings.
- \* Distinguishing this planning effort from others BLM has underway.
- \* Providing a meeting format that facilitated meaningful comments.
- \* Reaching a cross section of the communities impacted by the management of the public lands.
- \* Reaching those that use the public lands.

The public participation plan identified three ways to involve the public in the scoping process. The plan included: six public scoping meetings, a comment cruiser, and an invitation to the public to submit written comments via mail or email. All three are described in detail below.

## **2.1.1 Public Scoping Meetings**

The BLM scheduled open houses in six communities. These communities included Green River, Moab, Monticello, Blanding, and Salt Lake City, Utah, and Grand Junction, Colorado.

To encourage attendance and participation at these meetings, a multi-faceted notification plan to reach the public through multiple avenues was developed. Art work with the tag line, "Your Land. Your Future. Your Ideas," was created for use with all public involvement tactics to help the public distinguish this planning effort from all the other land use plans being developed by the BLM.

Public notice of the scoping meetings was published in the Blue Mountain Panorama, Emery County Progress, Moab Times Independent, San Juan Record, Grand Junction Sentinel, Deseret News, and Salt Lake City Tribune newspapers. Additional press releases were written and customized with information about each open house in the different communities and distributed to local newspapers. Twelve articles in newspapers were produced. In all cases, news stories with information about the open houses appeared in regional newspapers. In smaller markets, the press release content appeared verbatim in the newspapers. In the large Wasatch Front market, individual print and broadcast journalists were called to announce the open house.

Public service announcements (PSAs) with general information were written and distributed to radio stations for broadcast. Two weeks prior to the open houses, additional thirty-second PSAs were written for each open house market and distributed to radio stations in that market. During the week of each meeting, final PSAs were written and distributed to local radio stations with information specific to that week. Advisories were also distributed on the day of the event to newspapers, radio, and television news directors.

In Monticello, the city utility company agreed to insert a postcard along with bills sent to customers inviting the local citizens to participate in the scheduled meetings. The copy of the text was specific to this market.

A total of 321 individuals attended the six open houses. Table 1 presents the attendance for each meeting.

Table 1. Meeting Location and Attendance			
<b>Meeting Location</b>	Meeting Date	Attendance	
Green River, UT	October 14, 2003	15	
Grand Junction, CO	October 15, 2003	14	
Moab, UT	October 16, 2003	53	
Monticello, UT	October 21, 2003	54	
Blanding, UT	October 22, 2003	87	
Salt Lake City, UT	November 13, 2003	96	
Total	·	321	

## 2.1.2 Comment Cruiser

The Comment Cruiser idea was a new concept for the scoping process. Using the RMP logo art, a vinyl wrap was developed and applied to a vehicle, called the "Comment Cruiser." The distinct looking Comment Cruiser scheduled stops in 12 locations that included campgrounds, trailheads, visitor information centers, museums, sporting goods stores, a grocery store, and the University of Utah campus. Information was also provided about upcoming open houses, the planning process, and the Moab and Monticello RMP web sites. Over 200 comments were received from individuals at the tailgate of the Comment Cruiser.

The Comment Cruiser provided an opportunity to obtain comments from a different audience. Instead of relying solely on people attending public meetings, the Comment Cruiser visited locations where it would be easy for individuals to learn about the process and provide comments.

## 2.1.3 Written Comments

In addition to soliciting and receiving comments during the public scoping meetings, the Moab and Monticello FOs solicited written scoping comments. Comments were received throughout the scoping process (November 1, 2003, through January 31, 2004). The original deadline of December 31, 2003, was extended due to the high volume of comments received within the last weeks of December and the first weeks of January. Comments received after January 31, 2004, will be considered during the Alternative Development phase but will not be addressed in this summary. By the end of the comment period, 6,138 comment letters were received. The number of individual comments identified in the letters totaled 19,437. A large percentage of the letters addressed more than one issue.

## 2.2 SUMMARY OF COMMENTS FROM PUBLIC SCOPING MEETINGS

As people arrived at the public meetings, they signed in and received a nametag and a color-coded information packet. The information packet included an agenda, Planning Bulletin #1, and background information.

For the first half hour, attendees met with BLM staff and visited five stations with display boards providing preliminary issue information on recreation, lands and minerals, vegetation and wildlife, special designations, and general information about the Moab and Monticello BLM lands. During this time, the public had an opportunity to submit comments on index cards provided at each station.

Next, the public gathered in a group and were welcomed and given a brief overview by either the Moab or Monticello FO Manager. In Green River, Moab, Monticello, and Blanding, an elected county official also welcomed the group. The attendees were then divided into small discussion groups. Each discussion group had a facilitator to ensure interaction and equal participation and a scribe to capture comments on flip charts. Participation in the six open houses resulted in comments from 321 individuals.

The meetings resulted in 1,250 individual comments. Table 2 and Figure 2 below categorize comments from the public scoping meetings. Comments covered a wide range of topics, with some topics repeated more than others. The following pages summarize the comments addressed at each meeting (See Appendix B for the compilation of scoping meeting comments).

Table 2. Categorization of Comments from Public Scoping Meetings			
<b>Comment Category</b>	Total Number Received	Percentage of Total Comments	
Recreation	224	17.9	
OHV & Travel	216	17.3	
General	166	13.3	
Mineral Development	156	12.5	
Rangeland & Grazing	155	12.4	
Special Designations	144	11.5	
Cultural Resources	55	4.4	
Wildlife	49	3.9	
Socio-Economics	18	1.4	
Watershed	17	1.4	
Woodlands	11	0.9	
Visual Resources	10	0.8	
Vegetation	8	0.6	
Riparian	7	0.6	
Tourism	7	0.6	
Fire	5	0.4	
Lands & Realty	2	0.2	
Total	1,250	100	

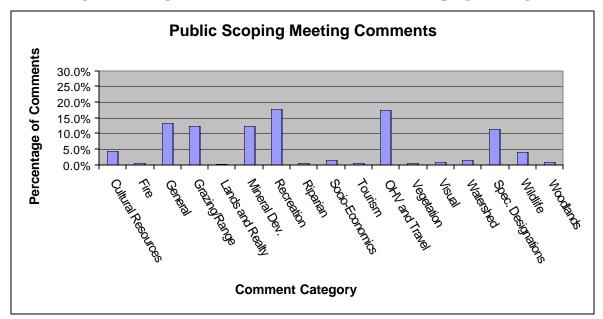


Figure 2. Categorization of Comments from Public Scoping Meetings

## 2.2.1 Summary of Comments by Meeting Location

## GREEN RIVER, UT (October 14, 2003)

Total Registered Attendance - 15

- \* Comments received at the Green River scoping meeting focused primarily on recreation and mineral development. Approximately half of all of the comments addressed one of these two issues. Overall, recreation comments focused on access and user education. Individuals called for more trails for motorized use, while others opposed the idea. Commentors also felt that a balance needs to be achieved between non-motorized and motorized use. Ideas included separate trails, or specifically designated areas, the closure of roads in areas heavily degraded, and improved signage and education. Educating different user groups on appropriate uses of the land was a priority for some. Education suggestions included improved signage, tourist information centers, increased number of posters and handouts, and more involvement with schools, associations, and user groups. River use and access was also another recreation related issue. Many commented on commercial use versus private use on the river, and the need for more recreational restrictions to be implemented.
- \* Several comments related to the impacts of mineral development on other resources in the area, with the Book Cliffs being a specific area of concern. The two primary areas of concern were related to conflicts with recreational uses and the impacts on riparian and watershed areas. Other areas of concern were with rights being denied for development. Mining was identified as an important aspect to the local economy.

Other comments received at the Green River scoping meeting include the following:

- Need to accommodate all interests/uses.
- \* Education on WSRs.
- \* Support land trade programs.
- \* Restore faith in the planning process.
- \* Involve the public in more of the decision making process.
- \* Analyze the impacts of drought on all resources.

## **GRAND JUNCTION, CO (October 15, 2003)**

Total Registered Attendance – 14

- \* Participants during the Grand Junction open house provided an array of comments. However, the majority of comments addressed the planning process and OHV use. Individuals suggested longer comment periods, unbiased decision making, decisions weighed heavier in favor of local interests, and involving local organizations and groups in the decision-making process. It was also suggested that the public be involved during the alternative development process.
- \* Recreational issues addressed were related to motorized recreation. It was suggested that OHV use be restricted in areas of cultural resource value, in riparian areas, and in specially designated areas. Noise restrictions on jeeps and motorized boats should also be implemented as well.

Other comments received at the Grand Junction scoping meeting include the following:

- \* Keep viewsheds intact.
- Promote low impact recreational uses.
- User education for all types of recreation.
- **&** Education on the regulatory process.
- Complete an inventory of existing routes.
- Implement a noxious weed control program.

## **MOAB, UT (October 16, 2003)**

Total Registered Attendance – 53

The Moab open house provided a variety of comments, however the majority of comments focused heavily on OHV use and access issues.

The most common position advocated implementing restrictions on the use of OHVs, designating use to current roads and trails, and omitting, or limiting use to certain areas. Though there were some parallel comments suggesting more availability for OHV use and implementing open areas. Suggestions included more enforcement, better signage, and involvement with clubs to lessen user impacts. It was noted that management needed to plan for multiple recreation uses, and primitive experiences. A comprehensive travel plan was recommended to help facilitate this need, and to minimize user conflicts.

Other comments received at the Moab scoping meeting include the following:

- \* Monitor and enforce noise ordinances.
- Protect wildlife migration routes.
- Maintain grazing at historic levels.
- Do not legitimize illegal trails.
- \* Regulate issues instead of omitting uses.
- Need to implement strong rangeland monitoring.
- Implement alternate use days for trails.
- \* Retain and nominate new ACECs.
- \* More enforcement is needed in WSAs.

# **MONTICELLO, UT (October 21, 2003)**

Total Registered Attendance – 54

Comments received during the Monticello scoping meeting, like Moab, focused heavily on access, and recreation. However, grazing and mineral development were also issues commented on several times.

- Commentors reflected the need for a comprehensive travel plan. An updated inventory of roads and trails was requested a number of times as was updated mapping of open roads and trails. Comments indicated that as OHV use increases, increased monitoring and education will be needed. Due to the projected increase in use, OHVs were asked to stay on designated roads and trails.
- \* Grazing was identified as an important aspect of the local economy, and the historic economic concern should be given priority. It was suggested that the RMP look at alternative ways to benefit the local economy, such as grazing allotment buy-outs. Commentors also requested that grazing be kept out of riparian and sensitive biological and cultural areas. Rangeland suggestions included prescribed burns for health and eradication of noxious weeds, as well as the banning of pinion chaining.

Other comments received at the Monticello scoping meeting include the following:

- \* More cultural resource protection and education.
- \* Mineral development is important to the local economy.
- \* Wind farming could have a positive economic impact on local economies.
- More staffing is needed to protect wildlife.
- \* Need more proactive rangeland management techniques.
- Increased protection is needed for cultural resources.

## BLANDING, UT (October 21, 2003)

Total Registered Attendance – 87

Grazing, mineral development, and recreation comprised the majority of the issues commented on during the Blanding open house.

- \* Reseeding, prescribed burning, compensation for pinion loss and soil loss reduction were all recommended for the benefit of rangeland health and grazing. Individuals voiced a desire for more water developments such as well drilling and ponds for livestock and wildlife. Requests that livestock be omitted from riparian areas were also noted. Commentors were also concerned about the lack of rangeland monitoring. Requests were made to implement a better monitoring system using accurate and up to date data. Allotment buy-outs were also recommended.
- Several comments requested an increase in exploration and mineral development for the benefit of the local economy. Commentors were also concerned about water quality, scenic vistas, and mitigation practices. Others requested that mineral development stay out of WSAs and other specially designated areas.

Other comments received at the Blanding scoping meeting include the following:

- Complete and implement travel plan.
- \* Conduct inventory and monitoring of existing road plan.
- \* Keep all roads and trails open.
- Opposed to too much wilderness (there are already too many restrictions on how we can use public lands.
- \* Address the problem of overlapping protective designations.
- Keep firewood cutting open.
- \* Increase the promotion of recreation opportunities in San Juan County.
- \* Protect sensitive cultural resource sites.

## SALT LAKE CITY, UT (November 13, 2003)

Total Registered Attendance – 96

Salt Lake City was the most heavily attended public scoping meeting, and several issues were introduced. Primary issues were recreation, special designations, OHV use and mineral development.

- \* Representatives from OHV clubs as well as those opposed to OHV use were both in attendance, creating debate both in favor of and against OHV use. Both parties agreed on more enforcement and education for user groups, as well as more involvement with clubs and organizations.
- \* In contrast to previous meetings, there were more comments requesting more protection of resources via specially designated areas, as well as the protection of WSAs. Although many recognized the need for mineral development in the resource area.
- \* Several comments called for increased limitations, or omissions in certain areas. Visual and noise impacts comprised several comments in regards to mineral development.

Other comments received at the Salt Lake City scoping meeting included the following:

- Protecting habitat and wildlife should be the highest priority.
- \* Buyouts and permanent retirement of grazing allotments should be encouraged.
- \* Eliminate grazing in riparian and other ecologically sensitive lands.
- Increased education of cultural resources is needed.

- Limit OHV access to sensitive cultural resource sites.
- \* Consider social and economic impacts from recreation.
- \* A complete list of roads and trails as well as current mapping should be completed.
- Need to implement strong rangeland monitoring.

## 2.3 SUMMARY OF COMMENTS FROM COMMENT CRUISER

Comments Received: Approximately 200

The Comment Cruiser solicited comments at various locations in Moab, Green River, Monticello, Blanding, and Salt Lake City, Utah as well as Grand Junction Colorado. Locations included information centers, sporting good stores, trailheads, campgrounds, and museums. The comments varied widely with the different locations visited. Comments solicited are summarized below (See Appendix C for the compilation of Comment Cruiser comments). Please note that many of these comments were submitted by more than one person.

- \* Restrict oil and gas development; no drilling on the Highway 313 corridor.
- \* Restrict mineral development.
- \* Manage public lands for the benefit of wildlife.
- \* Continue grazing practices on public land.
- \* Restrict grazing on public land.
- Provide a voluntary buyout provision for grazing rights.
- \* Restrict grazing in sensitive areas (e.g. riparian).
- Limit visitation to Mill Creek Canyon.
- \* Recreation uses need to be zoned to accommodate increased tourism (specific locations for specific uses). Need for non-mechanized areas. Need for areas set aside for primitive recreation.
- Separate motorized and non-motorized recreation use. Provide areas where there are no motorized vehicles.
- \* Camping restrictions and human waste control needed in Indian Creek, Kane Creek Crossing and the Upper Courthouse area (Bartlett/Mill Canyon).
- OHVs should be required to stay on designated routes.
- OHV routes should be kept open.
- OHVs should be limited, especially in wilderness areas.
- OHVs should be eliminated from sensitive areas.
- \* Keep Ten Mile Wash as a designated OHV route.
- \* Restrict commercial uses of public land.
- \* Rock collecting should continue to be allowed on public land.
- \* There should be no disposal of public land.
- Protection of archeological resources should be paramount.
- \* Maintenance of BLM facilities.
- Need for additional BLM facilities and hiking/biking trail improvements.
- Need to provide education and information to the visiting public, especially regarding OHV use.

- Need to enforce existing OHV rules.
- \* Involve user groups, such as the International Mountain Bike Association.
- Use volunteers for trail maintenance.
- Need to clearly mark private/public land boundaries.
- \* Availability of river permits on the San Juan River.
- Protection of historical artifacts and structures needs to be recognized.
- \* Administration of Cedar Mesa.
- Designation of WSRs.
- \* Noise ordinances and elimination of noise from public land.
- \* OHVs should be limited to licensed drivers.
- OHV use should be limited to those over the age of 21.
- OHVs should be subject to speed limits.
- \* Eliminate oil and gas development.
- \* No more exploitation of resources on public land.
- \* Grazing fees are too low.
- ❖ Ban scenic air flights over public land.
- \* Increase the numbers of wild horses.
- ❖ Increase BLM funding so that fees do not have to be charged.
- Increase the acreage of BLM wilderness.
- \* Turn BLM lands over to Native Americans.

## 2.4 WRITTEN SCOPING COMMENTS

In addition to soliciting and receiving comments during the public scoping meetings, the Moab and Monticello FOs solicited written scoping comments. Comments were received throughout the scoping process (November 1, 2003, through January 31, 2004). The original deadline of December 31, 2003, was extended due to the high volume of comments received within the last weeks of December and the first weeks of January. Comments received after January 31, 2004, will be considered during the Alternative Development phase but will not be addressed in this summary (see Appendix A for the compilation of written comments).

Various methods of comment submittal were used throughout the process including posted mail, email, and fax. Although handwritten letters were welcome, the majority of letters were received via email. Commentors were asked to address issues specifically for the Monticello FO, the Moab FO, or both. By the end of the comment period, 6,138 comment letters were received. The number of comments identified in the letters totaled 19,437 (Tables 3 and 4).

Prior to coding the written comments, a range of issue categories was developed into which the comments would be organized. This list was subject to change and was expanded as necessary as new resource issues were identified in the letters. Each letter was read and individual comments within the letter were then coded. Each comment was then entered into a spreadsheet related to the issue category that the comment addressed. One letter might contain comments on several issues. Following is a summary of comments received, organized by issue category.

Table 3. Categorization of Moab's Comment Letters			
Issue Category	Number of Comments	Percent of Total Letters with This Comment	Percent of Total Comments
OHV	3182	92.9	30.0
Mineral Development	2351	68.7	22.2
Special Designations	1507	44.0	14.2
Livestock Grazing	1394	40.7	13.2
Travel	952	27.8	9.0
Process Approach	933	27.26	9.0
Miscellaneous	93	2.7	1.0
Socio Economics	66	1.9	0.6
Recreation	54	1.6	0.5
Wildlife	20	0.6	0.2
Cultural Resources	24	0.7	0.2
Vegetation	7	0.2	0.1
Air/Water Quality	10	0.3	0.1
Wilderness	6	0.2	0.1
Lands	4	0.1	0.04
Fire	3	0.1	0.03
TES	2	0.1	0.02
<b>Total Comments</b>	10608		100

Table 4. Categorization of Monticello's Comment Letters				
Issue Category	Number of Comments	Percent of Total Letters with This Comment	<b>Percent of Total Comments</b>	
OHV	2382	87.7	27.0	
Mineral Development	2303	84.8	26.1	
Water/Air Quality	1369	50.4	15.5	
Special Designations	1357	50.0	15.4	
Travel	1072	39.5	12.1	
Process	117	4.3	1.3	
Miscellaneous	58	2.1	1.0	
Livestock Grazing	43	1.6	0.5	
Recreation	45	1.7	0.5	
Cultural Resources	26	1.0	0.3	
Permits	24	0.9	0.3	
Wildlife	9	0.3	0.1	
Vegetation	8	0.3	0.1	
Wilderness	11	0.4	0.1	
TES	3	0.1	0.03	
Lands	2	0.1	0.02	
<b>Total Comments</b>	8829		100	

## **2.3.1 Summary of Written Comments**

Below is a summary of all of the written comments received via post mail or email. This summary also includes those comments that can be handled through policy or administrative actions, or those that are considered out of scope for this plan (See sections 1.2 and 1.3).

## Recreation/OHV

Recreation and OHV comments were the most frequent type of comment received. Many different types of recreational activities were identified as important to individuals as well as organizations. Unique to this RMP, was the number of recreation and specifically OHV comments received. OHV issues comprised the largest percentage of the recreation comments received. The majority of OHV users were concerned about motorized use being omitted from the upcoming RMP, and petitioned to keep trails open. Other comments included discussion on the compatibility of different types of recreational uses, the compatibility of recreation with other resource uses, as well as socio-economic and ecosystem conditions. Jeep Safari's, commercial events, and permits were also discussed. Overall, the interest and concern of minimizing the impacts from recreational uses on other resources was reflected in large percentage of the comments received.

A concern not only for individuals, but for government and private organizations as well, is the need for a comprehensive travel plan that includes hiking, biking, horseback and OHV use. Route designation was one item addressed both in comments related to access and recreation. Access related comments indicated a need for general route data, while recreation comments also expressed a need for specific route and area designations. A considerable amount of comments also addressed access for the elderly and/or the handicapped, primarily stating that OHV use is the only means of access to the backcountry for these individuals. Suggestions also included the addition of short segments to complete a well-managed system for large and small loops. It was also conveyed that the integrity of the loop system be maintained, minimizing on-trail encounters and adding to the recreational experience. The popularity and projected growth in OHV use was a subject in many letters as well. Many stated that the RMP should plan for the projected increase by actively developing and maintaining more trails for this use.

Comments requested that the RMP consider concepts similar to recreation zoning and / or single-use trails. Reasons for these requests were the incompatibility of certain recreation uses, degradation to the resource caused by unclear regulations, mitigation of user conflicts and a desire for various types of recreation experience only available when other uses were taking place in other areas or at other times. Several responses indicated that an allocation of at least 40 percent of the total designated road/trail mileage should be dedicated to non-motorized use only. Re-routing trails with designated uses to avoid sections of roads or trails that are popular with a variety of user groups was also suggested.

Concern for other resources, including cultural, wildlife, riparian and sensitive areas, prompted several individuals to request that OHV use stay on designated trails and routes only, and that the BLM not allow any "open," or "play" areas within the resource area. However, on the contrary, several comments indicated the need for more "open" designated areas or that there should at least be a balance between "open" and restricted areas.

Several comments addressed the need for improved recreation management by the BLM. Suggestions included improved education, expanded law enforcement, and better signage.

Education was mentioned in several letters, requesting an improved OHV user education program. However, several comments suggested educating the non-motorized visitors about when and where they may encounter vehicle traffic or where to avoid traffic. Organizations, individuals and governments stated that increased education should be a critical component of the upcoming RMP. Other comments suggested a comprehensive education program for all recreational uses to promote healthy stewardship of the land, as well as minimizing user conflicts.

Along with education, several comments identified the need for law enforcement to be a top priority in the upcoming RMP. Individuals identified a lack of law enforcement as one of the reasons for resource degradation and user conflict, and that increased law enforcement is the best deterrent to resource damaging activities. Suggestions included using volunteers or peer enforcement using OHV groups as well as other volunteers to educate and enforce regulations, thus providing good stewardship for their own members and setting an example for other visitors. Several comments also stated that in order to facilitate enforcement, there should be a "closed unless signed open" policy, and that all trails should be closed and no route left open unless it serves a legitimate and identified purpose. Increasing fines and impounding vehicles was also suggested as a deterrent, keeping people on designated trails.

A need for improved recreation signage was another frequently received comment. Users identified the lack of signs on roads and trails as one the primary causes of resource degradation in the planning area. Many stated that painted rocks or boulders were not effective and more was needed. Numerous requests were made for the RMP to design and implement a comprehensive and consistent system of signage for all roads, trails, and other recreation sites. Signage would also incorporate user education in the form of trailhead kiosks and interpretive signs for cultural resources in appropriate areas.

Large commercial events such as the Easter Jeep Safari and permitting for large events as well as private parties was addressed in several comments and in a variety positions. In regards to the large commercial events, there were clearly two prevailing points of view on the subject. Many felt that large events need to be more restricted or banned altogether due to the impacts on the resource area, while others stated that it was good for the economy and did not have much of an impact on the ecosystem. Although there were clearly the same two points of view in regards to permitting, other comments were received. Many motorized and non-motorized users felt that a permit system was clearly needed. Permits would cut down on user conflicts, overcrowding on the more popular trails, and funds gathered from the permits could be used to address user education, critical areas awareness, and enforcement. However, many individuals stated that a permit system was wrong, and that users shouldn't have to pay a fee to access public lands. Others suggested a permit system for popular trails during peak season.

The interest in equestrian use was reflected in letters from individuals, as well as organizations and government agencies, indicating a growing interest in this type of recreation use. The comments expressed a need for the RMP to create, as well as maintain, all existing opportunities for horseback recreation. This would include trails designated especially for equestrian use, or where OHV use is prohibited. Climbing, a popular sport within the resource area was the subject of several letters as well. Several comments requested that existing routes be kept open. However, in the interest of wildlife, commentors also indicated that some routes are disturbing nesting birds of prey and should be closed seasonally or permanently. Primitive camping and constructed toilets were also requested near but not limited to popular routes, as a common need for both was indicated. The gathering of firewood for the purposes of camping or for sale was also addressed.

A need for more hardened or commercial campsites including sites for RV use was also reflected in letters received. The varied comments included banning firewood gathering in the resource area, no gathering within the zone of heavy use around Moab, and no overland travel to gather firewood.

Finally, the Recreation Opportunity Spectrum (ROS) was addressed as well. Individuals encouraged the BLM to recognize the demand for primitive recreational experiences, and to include more ROS designations to protect these experiences. Requests for the ROS to be made available for public view and comment prior to the release of any draft alternatives were also included.

## **Access/Transportation**

As mentioned above, the BLM is encouraged to complete a comprehensive travel plan. Travel planning, and effective management of motorized use has been identified as the largest issue to be addressed for the purposes of this RMP. Many felt that enforcement and education should be included as subcomponents to the adopted travel plan and that any plan should be open for public review and comment. Many key points have however been discussed in the previous Recreation/OHV section.

Motorized access was a consistent theme throughout the majority of the comments received during the comment period. A variety of comments, ideas and suggestions were submitted, with two prevailing themes being evident, open access and limited designation. One reason mentioned frequently to justify keeping roads and trails open to motorized access was need to provide access for all ages and abilities. The argument was also made that many primitive camping should remain accessible for all individuals as well. Motorized access is also a key component for maintaining gazing and mineral development. Many individuals responded by just asking to keep all roads and trails open to motorized access. Individuals also commented on the need for more trails to be opened or developed, and that new roads and trails should be opened for every one closed to mitigate displaced use.

Many individuals requested more restrictions to motorized access within the resource area. These restrictions included keeping all motorized access on designated roads and trails, no open areas, access only to specific areas, the closing of all roads and trails that don't serve a identified legitimate purpose, eliminating redundant routes, and no motorized access in specially designated areas such as ACECs and WSAs. Individuals indicated that these steps may help minimize long term effects while preserving the ecology and cultural resources, minimizing disagreements between different user types and reducing noise pollution in the backcountry.

Trail improvements, mapping and signage, and a comprehensive road and trail inventory were also highlighted in several letters. Regardless of the type of designation assigned to various routes, many felt that a comprehensive series of signs originating from the BLM should be implemented at the trail head and along segments, clearly indicating if the trail is open, and the types of use allowed along that particular segment. Some also suggested posting signs at the beginning and end of each trail with instructions on reporting illegal and irresponsible use. Many also suggested that the travel plan be published in a map form and made available for public review and use.

A number of comments addressed the effects that the designation of ACECs and WSAs may have on the transportation network. Comments argued that no new designations should be made,

while others commented that all existing roads and trails should be closed within the current and future designations. Those in favor of access presented the case that roads and trails do not impact the other resources within these specially-designated areas as well as the rest of the resource area, while those opposing argue that roads lead to the degradation of other resources protected within specially-designated areas, and need to remain or be designated closed.

Several comments also suggested that restricted access or the elimination of motorized use on roads and trails within the resource area would not be in the best interest of the local economies due to the large volume of OHV users that would then travel elsewhere. It was also stated that restricting or closing trails would create more of an enforcement issue with the increase of illegal and possibly more damaging use that would occur.

Comments also addressed the issue of backcountry airstrips as a viable transportation resource that should be kept open. A comment stated that airstrips represent disturbed areas, and in some cases, major cut-and-fill techniques were used during construction and that minimal standards should be maintained. Maintenance should include brush removal, surface grading, seeding, windsocks, and advisory signs for those on the ground. Some comments discouraged scenic air tours over backcountry areas.

## Mineral Development - Oil, Gas, and Mining

Mineral exploration, leasing and development items were frequently mentioned topics in many of the comments received. A full range of issues was identified both in support of and against mineral development. The majority of the mineral development comments addressed economic, access, ecosystem health issues, and visual resource management (VRM).

A large number of comments specifically requested at the very least, the use of No Surface Occupancy (NSO) designation for all WSAs, ACECs, and all lands proposed for wilderness designation in the America's Redrock Wilderness Act. Many other comments proposed withdrawal of certain areas from mineral entry. These areas include special designations, lands containing cultural resources, important wildlife habitat, water resources, unique geologic formations, and areas of high scenic values. A number of comments did, however, state that oil and gas exploration and development activities are fully compatible with semi-primitive recreational values and opportunities. The banning of coal bed methane development in the Book Cliffs area was of particular interest to many who responded.

Many comments identified access for oil and gas development as a significant problem in the resource area. Individuals requested that no oil and gas leasing be allowed in either resource area, while others suggested that NSO be a standard stipulation for all leases in the area. Individuals also requested that the suitability of mineral development be examined across the resource area and strictly limited to areas where it was deemed most appropriate. Others suggested proactively terminating leases that are either inactive or are not meeting production requirements.

Respondents suggested that the impact of oil and gas development should be fully disclosed through a full EIS for every permit application to ensure that leasing only takes place when the natural and ecological resiliency is assured. Concern over the issues associated with access to a well site was expressed. Issues listed were roads, traffic, recreational uses of roads, and user created spur routes. Wildlife, fences and cultural resource concerns were addressed

Comments involving improved mitigation, reclamation, and restoration standards for mineral developments were addressed. These comments also included the restoration of pipeline right-of-

ways (ROW). The comments identified a need for protective standards to be strengthened and included requiring the oil and gas industry to bond for the full impacts of the proposed development.

Economics were also mentioned as a factor for considering restrictions for mineral development, as well as employment opportunities brought by mineral development. Individuals requested that cost/benefit analyses include the full costs of the impacts caused by mineral development. Some persons stated that the long-term benefits of recreation value in terms of tourism out weigh the short-term gains of mining and drilling. However, mineral development was also identified as an integral part of the local economy creating opportunity, past and future, for higher paying employment, and needs to remain part of the multiple use mandate. Alternative energy sources such as wind power were also suggested as an issue to consider.

## **Special Designations/Wilderness**

Comments received regarding wilderness and other types of designations were few in number compared to recreation/OHV/transportation. Most of the comments received were either for the use of special designations, or against them. Although a few comments requested that the BLM offer more education opportunities on the benefits and impacts of special designations. Individuals indicated support for existing WSAs and ACECs and requested that the RMP consider additional designations. Conversely, many other individuals stated that WSAs and other designations were too restrictive and had been overused in the past. These people did not usually support new designations in the new RMP. Some of the designations to which these comments refer include WSAs, WSRs, ACECs, wilderness proposals, and the uses allowed within them.

Wilderness and WSAs designations were the most frequently commented on. Many felt that WSAs were one of the more effective ways to protect the ecosystem and asked that existing WSAs be maintained while designating more in the future. Individuals indicated that the ability of these designations to restrict uses within areas is the primary benefit of this use. Specifically mentioned resources in need of restrictions through special designations included oil and gas development, OHV use, and grazing. Commentors requested that these uses be restricted in all existing WSAs, and that further designations are needed to further curtail these uses. A considerable number of comments requested that parts of the Citizen's Wilderness Proposal, from the Utah Wilderness Coalition, and the proposed America's Redrock Wilderness Act be managed as wilderness areas until a designation has taken place. Suggested restrictions on these lands include NSO stipulations, mineral withdrawals, and OHV restrictions and exclusions.

Many commented in opposition of current and future WSA designations. Comments indicated that these designations create unreasonable restrictions for many activities. Maintaining access to trails for all uses, in particular OHVs, was the primary theme for this type of comment. Restrictions include limiting access for many individuals who may not have the ability to travel to particular destinations, curtailing their recreational experience. Many individuals stated that there are plenty of lands currently designated as wilderness, and that future designations were not needed. Several felt that this creates an unbalanced approach, and is directly associated to the anti-OHV movement.

Although comments in regards to ACECs were not common, persons writing comments requested the BLM to designate all lands that contain significant cultural, geological, scenic, recreational, and plant and wildlife habitat values as ACECs. A few people referred to specific

areas that should be designated. Some felt that ACEC designations would be too restrictive and therefore opposed any new ACECs.

Several comments related to WSRs. Comments included those in favor of designations, with many submitting lists of eligible segments, to those opposed to any new designations. Some people indicated that any restrictions to access that WSR designations may caused should be carefully considered in the RMP. Opposition came from local government agencies concerned about the affect designations may have on their communities. Others questioned eligibility standards, stating that washes and small streams should not qualify for protective status.

The BLM was encouraged to maintain special designation continuity between land management agencies (Forest Service, National Park Service), as well as between BLM field offices. Public notice, as well as a proper comment period, was requested for special designations as well.

Comments concerning visual resources encouraged BLM to designate all current and future wilderness designations as Visual Resource Management, Category I (VRM I) to preserve the character of the landscape.

## Rangeland/Grazing

Range management and issues associated with livestock and grazing management were frequently submitted comments. Comments generally fell into one of several categories including, grazing rights, ecosystem health, socio-economics, and recreation management. While the comments fell along a spectrum of potential range management strategies, there are clearly two predominant points of view: those who wish to limit or eliminate livestock grazing, and those who wish to maintain it.

The majority of the comments identified the issue of ecosystem health as related to grazing as an integral part of the RMP analysis. Nearly all of the comments offered an array of opinions or strategies on how to maintain and improve range health. These comments included lowering permit numbers to more realistic levels, requiring grazing allotments to be in good or excellent condition, closing fair and poor condition allotments for recovery, seasonal grazing restrictions, allotment buyouts, extended periods of non-use for conservation purposes, and the reallocation to non-livestock use based on consideration of wildlife and other resource concerns. Several comments addressed the issue of the on-going drought in southern Utah and requested a more proactive management approach in dealing with this issue.

Although the comments discussed a variety of issues and strategies, the majority of comments requested that grazing be eliminated from riparian and other sensitive areas. Comments indicate that the ecosystem function is being severely threatened by the presence of grazing in these sensitive areas. Concerns included wildlife and vegetation reduction, invasive species and increased soil loss. A number of comments requested that fencing be used around these areas to minimize impacts. Other comments desired that areas that are "functioning at risk," or "not functioning" should have livestock removed, or that increased monitoring and the best range science available should be applied to determine the impacts of grazing in riparian areas.

Grazing is a way of life for many within the surrounding area and a part of the local economy. Comments indicated that public lands grazing should be recognized as a historically important use of lands and that this use be allowed to continue to preserve this culturally significant activity. Not only is it culturally significant, but comments also stressed that grazing is an integral piece in sustaining the local economies within the area. Economic alternatives to benefit

the economy included allotment buy-outs, and the suggestion that wildlife and hunting brings in more money to the local economy.

Wildlife, bighorn sheep, artificial water developments, and range treatments were among the other range and grazing issues. A number of individuals commented on the lack of available forage for deer and other wildlife due to overgrazing and drought in areas. Protection was requested for bighorn sheep in the Rattlesnake, Professor Valley, Potash, North San Juan, and Dolores Triangle herds. The elimination of domestic sheep allotments was also requested.

Respondents identified artificial water developments as a management action they felt was harming the resource. Individuals requested the RMP to examine the possibility of prohibiting development of water sources for livestock. Others felt the RMP should address a more streamlined process for approving new developments, not only to be a more effective management tool for livestock, but for wildlife as well.

Range treatment and its conflicts with range health were reflected in the comments as well. Several comments called for the eradication of invasive plant and noxious weed species to be addressed in the RMP. While no one disagreed with this comment, several stated that the use of poisons or toxins should not be utilized during this process. Individuals also called for an adoption of management practices that allows for a natural fire regime to be restored to the management area, while establishing fire suppression areas around developed areas.

Individuals also stated that recreational uses and grazing should be segregated. Individuals stated that manure and the trampling of fauna in campsites and various other recreational areas downgraded the recreational experience. Others commented that recreation in grazing areas, specifically OHV use, was impacting the amount of forage available for livestock as well as wildlife.

Finally, several individuals stated that standards for rangeland health, including monitoring, and assessment programs, must be employed to determine management objectives for livestock grazing. These same comments also addressed the need for more analysis and data to correctly manage these lands.

#### **Process**

A few of the comments received addressed ways in which the BLM might improve some of the practices it uses in the RMP process. Others discussed ways in which the BLM may improve general agency management, improve interagency cooperation, or work with other organizations. Comments of this nature were categorized as administrative.

Individuals discussed the public involvement process being used by the BLM in the RMP planning process. Many of the letters dealt with who should be included in the planning process. Some felt that local governments, state agencies, and federal agencies should be included in the alternative development process. Others felt that the process should be open to all in the conservation and scientific communities as well as county and state agencies. Some respondents commented that local input should carry more weight than those outside of the immediate area planning area. Local comments also included the request that the future RMP also comply with county plans, matching the scope of issues and objectives in these plans.

A theme fairly consistent throughout the resource comments was the suggestion that the BLM improve their relationship with private as well as public stakeholders. This request is made to

improve the overall management of the planning area. Comments were related to education, public outreach, more postings at major trail heads and through media sources with updates regarding the planning process, and more opportunity to comment throughout the planning process, including alternative development, the ROS, and special designations.

#### **Socio-Economics**

Most comments received discussed the benefits of resources on the local economies surrounding the planning area. It was requested that the economic impacts on local communities be studied prior to any land use decisions being finalized. Resources specifically mentioned were mineral development, grazing, tourism, and OHV use. OHV use comprised the bulk of these comments. Most individual comments reflected the benefits of OHV use within the local economies. In response to the fear of OHV closures, individuals commented on money spent on accommodations, food, parts and various other goods while visitors stayed in the area.

Grazing has long been a part of the local communities as well as part of their identity. Local governments as well as individuals characterize livestock as an integral part of the local economies and believe significant economic repercussions are possible with any restrictions on livestock grazing. Some suggested that the economic benefits from wildlife and hunting would outweigh the benefits from grazing, and the RMP should be amended accordingly.

Mineral development was mentioned as an important aspect of the economy as well, since wages are considerably higher than most other industries within the area. Some individuals did, however, argue that the long-term impacts from recreation or tourism outweigh the short-term gains of mining and drilling.

## **Cultural/Historic Resources**

In response to both Moab and Monticello FOs being known for their high density of cultural and historic resources, several letters addressing these resources were received. As with air and water quality, many comments addressed cultural resources as a separate resource, while many respondents mentioned cultural resources in response to rangeland and grazing, recreation, mineral development and transportation planning practices. Although these comments addressed several different resources, responses indicated a demand for a more proactive approach to cultural resource management.

Several commentors requested more enforcement or periodic enforcement around known resources along with prosecution for vandalism of these sites. A large number of responses reflected the need for more volunteer involvement to help monitor sensitive areas as well as popular archaeological sites. Increased public education on the sensitivity and the value of these sites, as well as the interpretation of sites that are easily accessible, was also mentioned several times as well.

Individuals also requested mitigation efforts to include an up to date Class I overview to be included in the RMP, cultural surveys along all new designated OHV routes and other high use areas, keeping livestock out of known archaeological sites, the non-disclosure of sensitive backcountry sites, the designating of OHV use to trails only, or banning OHV use completely from areas with sensitive sites, and the increased protection through the designation of an ACEC.

Native American groups within the planning area suggested that special attention be taken to preserve the cultural resources within the area. A request was also made for a list of plant species to identify their use, and help ascertain their resource values. Individuals also requested

that the BLM work with local and regional Native American groups to determine which areas are considered sacred or traditional use areas.

## **Air/Water Quality**

Issues in regards to air and water quality were received from several individuals and organizations, indicating a concern for these resources. Although some comments directly addressed air and water quality as an independent resource, most comments were addressed within rangeland and grazing management, mineral development and recreation management.

The majority of comments received in regards to water quality addressed the issue of grazing in riparian environments. Individuals and organizations encouraged the removal of livestock from riparian or wetland areas along with the development of an effective monitoring program to prohibit grazing as well as to measure biodiversity and wildlife populations. Respondents were also concerned about recreational uses in riparian areas. Suggestions included no new recreational facilities in riparian ecosystems, except areas for small signs, as well as the banning of motorized recreation use in these areas. Many comments were concerned about the impacts on air quality from commercial and special events in the area, as well as decreasing the impacts on roads from OHVs.

Several comments addressed the need for a comprehensive inventory of riparian and wetland areas in order to effectively protect these resources. Comments also suggested a more proactive approach through gathering data, setting aggressive standards, and establishing an effective monitoring program.

## Wildlife

Comments in regards to wildlife management and associated issues were limited in number, although some comments were already addressed in previous resources. Continuity between management agencies (Utah Division of Wildlife Resources (UDWR), Forest Service, National Park Service), as well as between BLM field offices was encouraged.

Commentors support the presence of wildlife in the resource area, and offered suggestions on how to maintain a healthy wildlife population as well as its habitat. The BLM should place a priority on protecting riparian and water resources, implement seasonal restrictions on visitor use and extractive uses, manage for unfragmented habitat by reducing road density, protect migration routes, and eliminate or reduce livestock grazing and OHV use. The elimination of range treatments and guzzler-type water developments were also suggested. In regards to fire management, there were some commentors that wanted the EIS to address fire management policies and the effect those policies have on the wildlife habitat within the planning area.

Some commentors would like to see primacy given to protection of endangered, threatened, or sensitive species where they may be adversely affected by other land uses. It was suggested that the BLM use the best available science to establish utilization levels that sustain a healthier rangeland for wildlife and livestock grazing.

## **Fire Management**

There were relatively few comments specifically addressing fire management. The comments received encouraged the re-establishment of a natural fire regime, allowing natural conditions to be restored. However, some people also requested that fire suppression areas or buffer zones be

implemented around developed areas because of concerns of health and property. Fire was also recommended as a rangeland tool to eradicate invasive plant and insect species.

## **Lands and Realty**

Based on the limited amount of comments in regards to this issue, it is evident that lands and realty was not a concern for most during this process. Comments received stated that individuals would like to see the RMP identify lands suitable for acquisition, trade or disposal. These individuals would also like to see access points as well as other cultural or important sites on private lands acquired.

# Green River, Utah Open House October 14, 2003

## **Small Group Discussion Flipchart Transcript**

(One Group)

# Education of appropriate use of land:

- Tourist info. Centers
- Posters/hand-outs
- Work with associations/ recreational user groups
- Work with schools outreach
- Cleanliness of areas tied to education
- Get beyond "them/us" attitude multiple use utilize lands/respect for all
- Education of BLM responsibility/RMP process/jurisdiction
- Everything can't happen everywhere how to decide priority
- Conservation instead of preservation

## Lands and Realty:

- Support for land trade program legislative exchanges
- Trades cold address management issues
- Land fill right-of-way through BLM land

#### Land Use:

- Effects of drought on all resources, for example, effects of use on ground
- Inability to use land historical uses
- Accommodation of all interests/multiple use

## Management:

- BLM kinder image get away from gun-image/change tactics don't act like a policy agency and involve the public in decisions
- Get an image of "our land" the BLM needs a softer image. They are viewed as abusing their authority -- put on a different/softer face
- Support those that manage the lands

## Mineral Development:

- Oil /gas development impact this area will public comment have any effect?
- Oil and gas conflict with other uses such as recreation
- Mining denied rights to surface mining
- Mineral development watersheds special consideration for drought
- Influence on oil and gas stipulations
- County dependency on oil and gas revenues
- Mining making a living
- Develop tar sands
- Area of concern Book Cliffs controversial

## Motorized vs. non-motorized use:

- Separate areas/designate areas
- Close roads in areas of abuse
- Improved signage/education post areas
- Designation of OHV trails
- Should be designated areas for off-road
- Should be designated areas for non-motorized
- No restrictions on road to Nefertiti

## Special Designations:

- Commercial outfitters supportive of wild/scenic river
- Use on river (eligibility)
- Motorized use on river (Green River)
- Private use of river/right of way/ commercial use
- Is wild & scenic part of special designation process?
- How long has wilderness not been added upon?
- Perceived problems with wild and scenic is that the BLM is using it to prevent damming of the river in the future.
- WSA's wilderness study areas how established? Education
- Proposed WSAs? Some are dry pockets (river)
- Restriction on uses for recreational section of the river?

## Grand Junction, Colorado Open House October 14, 2003

## **Written Comments**

Bicyclist from Park City is concerned that Oil and Gas development may be visible/obvious from developed bike routes (i.e. Slickrock, Poison Spider, Kokopelli's Trail, etc.) because of increased emphasis from Washington on Oil and Gas development. Wants to keep view-sheds in tact.

Concerns about Green River Labyrinth Canyon area and access of river by jeeps and motorized boats. Would like to see stricter regulation in regard to noise and motorized access.

## **Small Group Discussion Flipchart Transcript**

(One Group)

#### Cultural Resources:

Protection of cultural artifacts like on Cedar Mesa

## Grazing:

• Cattle grazing stay as a multiple use

## Land-use Impacts

- Address all users of land
- Gentle use of land multiple use
- Address issues of sensitivity areas
- Rock-climbing/hiking/backpacking low impact uses
- View multiple use so that all interests are served, not just based on revenue
- Designation of certain areas separate use for land areas, for example, Cedar Mesa and Kane

## Management:

- Enforcement of management plan
- Protect biological islands
- Protection of pristine areas
- Consistency of management (Utah Rim, Rabbit Valley, State lines)

## Minerals:

- Criteria for identifying oil and gas development areas; for example, Hovenweap
- Compatibility of adjacent lands concerned about potential oil and gas use

## More public voice in decision-making

- Longer comment periods
- No favoritism to certain groups
- Equal voice for all groups
- Local groups come together and will be taken seriously
- Power to local decision-makers with national
- No top-down decision-making
- Equal weight for all user groups
- Possible public involvement in the development of alternatives for example the Colorado RMP
- More collaboration
- Education on the regulatory process
- Manageable information so the public can address it

## Noxious Weeds:

- Organized weed control program such as tamarisk similar to Colorado's program
- Work with Colorado BLM in weed control
- Public participation in weed control

## OHV/Transportation:

- Place restrictions on OHV use allow multiple use
- Areas with cultural value, there are concerns for OHV
- Lower Indian Creek area limit ATV use, impacts on riparian area
- Complete inventory of existing access routes
- Definitions of existing routes some recently created closed off
- Close all illegal roads
- Dry washes as travel ways for ATV's Yellow Cat

## Special Designations:

- WSA either they become wilderness or take them off Decide!
- New inventory of potential WSA's
- Better/more signs (WSA)
- Regulations to designate ACEC don't take WSA and turn to ACEC without due process
- Designations (ACEC) through BLM process
- Creating buffer zones for uses Tem Mile canyon
- Buffer zones may increase WSA area ATV users have a problem with that
- Buffer zones for specific areas based on size/area, etc.
- Strong protection of White Canyon (SW Natural Bridges area)

## Moab, Utah Open House October 16, 2003

## **Written Comments**

Object to continuing number of ATV trails.

Fear ATV trail signs would be ignored – in fact, they are blot on environment.

Have been moved off a hiking trail by an ATV

We walk around cryptogrammic soil, we try to keep on trails & roads when hiking.

Process – there is no detail on the website, no meeting agenda. No need to have a big graphic.

Vision for BLM lands – Make ecological integrity the first management principle. Watershed hydrological function is the best single indicator for ecological integrity.

We are primarily recreational users – hikers. We use 4wd to access backcountry routes, but we are not ORVrs.

Manage in light of ecological integrity as the first management principle.

The Quiviva Assn. has demonstrated numerous times that you can do effective restoration of degraded rangelands, restoring watershed function, vegetative diversity, and increasing livestock forage availability on a sustainable basis with good management techniques.

View uses through lens of managing them to restore, or at least avoid degradation, of ecological integrity of public lands.

Primary concern is desertification due to long-term drought cycle (1998 - ?) which makes land less or unable to recover from impacts – overgrazing, trampling by machines and ovganisars, soil compression, and consequent soil loss from wind and water erosion.

The explosion in mechanized off-road use makes a policy of "closed unless posted open" and confinement of vehicles to designated routes a planning necessity.

Wild & Scenic Rivers -- West Water Canyon, the Dolores from Stateline to Dewey, and the Green from I-70 to boundary with Canyonlands should be wild and scenic.

2 BLM rangers for area of this size and with this volume of use is totally inadequate. BLM needs more rangers to enforce regulations (especially ATV use) and protect resources.

Limit number of high impact special events.

Control ATV's.

Protect viewsheds, especially from Arches/Canyonlands NP and Canyon Rims Rec. Area.

Every part of the earth is sacred but we treat it poorly.

Place more restrictions on motorized vehicle travel – designate areas to specific types of use.

Concentrate on communication with other agencies & with visitors.

Focus on sustainable tourism.

Need more enforcement agents & educational materials about preservation of public lands.

Motorized recreation is overtaking non-motorized and visitors will go elsewhere.

Want to see lot more signage and work with other groups and build more partnerships – working together is key.

Invasive weeds are out of control – please minimize vehicular travel routes & no open travel areas.

Drought – set grazing levels so lands don't suffer – err on less cows & there's more moisture, then there will be more wildlife & it won't look quite so like --- cow pies.

Declare most of the critical wildlife habitat as wilderness.

No commercial timber harvests, except by FSC certified (or better) contractors.

Drought - Daryl Trotter was reassuring me that rangelands in trouble have had cows reduced. This is good news, the condition of much I've seen has me worried. In this deep drought, I believe it is so important to think about the deer, antelope, elk that are in a fairly desperate situation. Food is so limited. I would hope more cows would be removed.

Vision is for continued multiple use. Is working in most areas. Continued educational efforts with various user groups is necessary.

Involvement of area clubs in this effort is increasingly needed.

Increased enforcement efforts are probably necessary in the notable problem areas.

Perhaps a user "host program" in trouble spots could be initiated to encourage better user ethics in these areas.

Need clear & adequate travel plans which make it clear where motorized & mechanical vehicles may and may not go.

Close off tracks that don't go anywhere & have no reason to be there.

Use adequate signage for trails, roads.

Protect our public lands.

Keep areas open to multiple-use – responsible multiple use.

Oil & gas drilling, 4-wheel drive road use, grazing, mining, recreation can all be done with low impacts used latest technology with "clean" results.

My husband had rheumatoid arthritis – hiking and biking are not possible for enjoying backcountry around Moab.

Mineral and gas resources can be extracted with minimal impact so as to create less dependence on foreign countries for out energy.

The natural beauty of Moab's canyon country should be taken into consideration and not unnecessarily exploited.

My plea is for a balanced plan of public use.

Keeping 4 wheel drive trails open is very important to us – only access my disabled husband has to backcountry and natural features.

We truly appreciate awesome beauty of this placed and feel blessed that considerable access is still available.

Make use of user groups – allow them in the area they wish to use. Allow a group to build a trail or trails in BLM approve area –user created trails are more appealing to user group and will cause people to keep coming to Moab.

Everyone should have a place to go here – no matter what the user group. If a group has a plan, and it can follow BLM guidelines, they should be free to run with it.

Keep camping area fees low (\$5) or no-cost.

We don't need more "development" (structures) for camping. Just the basics – toilets, dumpsters (both to address waste problems) & places to park.

I value quiet, solitude, wilderness, wildlife.

I wish ATV's would go away. Noise pollution is terrible, they encourage laziness – a more society problem. Maybe have ATV-concentrated areas.

Hire local trail crews! There's lots of maintenance to do.

Area has survived pretty well with current multiple use plan.

I see impacts in specific areas due to heightened use – overall, access should remain, but brochures, books, maps, tour groups, etc. that combine to point the public to specific areas should be discouraged – this is a huge area!

Damage in Bull Canyon heading up to Gemini Bridges is terrible (and I am a motorized recreationist). This is an example of overuse and poor user ethics and I would encourage a heavy enforcement presence in the area until the message is delivered.

90% of the area is not suffering from over use and should be managed as is.

We must leave the wilderness alone. All of our actions are negative. We are killing off life – not fair for us to take down so many innocent species!

Canyonlands Field Institute (operates outdoor/environmental education facility in Professor Valley – Moab Field Office on BLM land under lease) requests the current lease areas and some additional acreage (total 15 acres or so) be identified for disposal in the revised RMP. Our desire to pursue either a long term (20 year) lease or pursue patent purchase through the Recreation Public Purposes Act. We have conducted outdoor science/history field study programs in area since 1985. Long term lease or patent will allow us to secure serious(?) funding to underwrite modest but necessary upgrades (water, electric, septic) and scholarship/teacher training underwriting.

Tourists should be allowed to retain access to and within leased areas.

When access is allowed for mining, mineral, oil and gas, etc. production, the BLM should allow public access on same routes via the means (routes & transportation modes) allowed for the developer. If development site access is allowed on a road by motorized vehicle, public should have same route access by motorized vehicle. If access is by foot on a hiking trail, then public should be allowed hiking access to area on the hiking trail and so on. Access limitations to a development/production site may be necessary, but access to the area should be allowed and consistent for the public.

Tour companies, shuttle services and hordes of tourists seem to have greater impact on public lands around Moab than 100 years of grazing.

BLM is under lot of pressure to provide for recreation industry – public land for private gain and they want more and more opportunity to do so. OHV's in Moab in huge numbers and play on public lands by individuals, clubs, and outfitters. As a resident, taxpayer and business owner, I share the cost of all this – mostly in terms of trash, police, higher prices of goods.

I'm glad recreationists value the experience of getting out in nature to recreate. What I lament is the loss of quiet and solitude, the ability to see wildlife in a natural setting. I've never felt closer to God than when riding a horse through this red-rock desert.

Insofar as trails & tours can be planned, it is important to plan for places without the commercial traffic and motors.

Section 202(9) of the Federal Land Management Planning Act states "To the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies of the States and local governments within which the lands are located. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

Reference the San Juan County Plan relative to RS2477 access rights-of-way, mineral potential areas for oil, gas, potash, uranium, vanadium and copper.

It is assumed that grazing will be kept at historic levels.

## **Small Group Discussions**

(Four Groups)

### Group 1.

## **Topics Listed for Discussion**

Mining-Pipelines

Designations

Education

Oil and Gas Industry

Noise

Non-Mechanized Areas

Enforcement

Wildlife

ORV Use

Grazing

Solitude

#### Designations:

- Designations are confusing what can you do where?
- State with designated routes, shrink to a point that can be monitored
- Road inventory eliminate redundant roads
- Reclassify unused roads to trails (non-motorized, non-mechanized)
- Reclaim little used roads take them off system
- WSA should get full recognition
- White Wash designated as an ACEC

### Education:

- Make responsible land use part of drivers' education tie with safety course
- Safety course/or drivers' license
- Teach Trail etiquette/respectful
- Work with local businesses to develop user education programs pamphlets
- Travel Council, local businesses
- Placemats, gas stations, restaurants
- More trailhead kiosks
- More signs & physical barriers so people know where they are or should be
- Fee system with permit to create more funds for education

# **Enforcement:**

- More enforcement is needed in WSA
- Don't have more rules if you can't enforce them
- Use physical barriers instead of more rules
- Be serious off trail violations should evoke serious penalty, e.g., confiscation
- Make trail groups accountable for their numbers
- Licensed drivers

- Put police blotter on front page
- Partnerships with groups to help enforce
- If an organized event creates/causes damage, limit the event next year, next event

### Grazing:

- Need process to determine which lands should be available for grazing and how to remove those there should not--- Peavine Valley & Buck Hollow are contributing erosion into Lake Powell due to overgrazing
- Wildlife gets along better with cows than they do with condos. Evaluate the impacts of grazing versus the amount of impact of tourism/use recreation
- Everything has impact
- Grazing can be done properly -- can benefit land
- Wildlife versus grazing amount of forage available competition
- What is the effect of the drought on wildlife/vegetation

## Mining-Pipelines:

- Require companies to make old uranium mines/shafts safe close, reclaim mines/shafts
- Are there toxic materials at old mines?
- Conduct inventory of old mines?
- Require company to put up bond for reclamation
- Protect ground water
- Conduct better monitoring of revegetation of pipeline ROW's

#### Noise:

- Quiet is good
- Monitor noise levels
- Record noise level to learn what is happening (establish baselines)
- Enforce existing noise laws
- Create a rule regarding noise levels
- Behind the Rock lots of noise Gold Bar Rim area
- Helicopters establish and enforce altitude restriction and emergency use only

#### Non-Mechanized Areas:

- Foot/hooves
- Mill Creek where non-motorized/non-mechanized existing use should remain
- South Fork
- 7 Mile Canyon
- Kane Creek from Hole in the Rock off 191 to concourse
- Ken's Lake
- Riparian Areas

# Oil and Gas Industry:

- Require oil industry to bond for the full impacts make these impacts known to the public
- Limit new oil exploration & development to areas with historic disturbance

- Encourage oil and gas exploration to decrease dependence on foreign oil helps local economy
- Acknowledge the scenic value of the area trumps marginal oil potential
- Eastern Book Cliffs and Montezuma Creek are two areas where oil & gas development could occur
- Avoid Lockheart Basin

#### ORV Use:

- Causing desertification/sandout
- Erosion promotes denuding of areas
- Creating new multiple trails
- Noise impacts
- Impacts on wildlife
- Need places they can go
- Need more places they can't go
- Restricted use
- Conflict between horse use and ATV use
- Require a minimum age to operate and a driver's license to operate
- Rental agencies are renting without any liability make them liable
- Promote and advocate
- Allow anywhere that they don't hurt wildlife
- Create areas that are Quiet
- Promote ATV's that have reduced noise
- Need more money for enforcement
- Cooperate with Sheriff and police departments
- Don't legitimize illegal trails

Moonlight Meadows Fisher Mesa Jackass Canyon

### Solitude:

• It is important

### Wildlife:

- Wildlife hates noise
- Continue development of antelope range reintroduction
- Mule deer population is way down. Why?
- Limits on mountain lion takes
- Eliminate cattle to protect wildlife
- Eliminate tourists to protect wildlife
- Establish wildlife refuge areas (Behind the Moab Rim, Behind the Rocks)
- Protect Migration Routes it is a problem
- Help elk winter range

## Group 2.

## **Topics Listed for Discussion**

Minerals and Oil and Gas Leasing Recreation Travel Plan and ATV Incursions Grazing Resources – wildlife, vegetation, etc. Rock hounding

## Grazing:

- Keep grazing the way it is
- Animals do a lot of good
- Consider re-seeding
- Need strong monitoring program close allotments that are not in good condition if standards are not met
- Ranching is a livelihood when numbers are cut, economy is cut.
- Right to graze should be open for sale by willing sellers

## Mineral Development

• Don't close the door on it; there may be future opportunities

#### Minerals:

- Oil and gas have been explored may not be world class deposits
- Recreation, wilderness & wildlife should take precedence over new leasing outside of existing leases
- Is there a way to capture changes in economy with criteria, i.e., change policies as economy changes
- There are other minerals besides oil and gas
- Should not be able to "trash" areas for low grade minerals

#### Recreation:

- Plan under the assumption that visitation will grow
- Motorized use is up
- Non-motorized use is up
- Create more non-motorized use for more non-motorized users
- Non-motorized use is desirable creates fewer impacts than motorized use
- Degradation of natural resources
- Non-motorized users sometimes ignore signs
- Jeepers are more responsible
- Jeep Safari is more responsible
- Need more user education
- Need to have more designations
- Motorized users are here should provide areas for motorized use

- Machines are constantly changing damage is growing exponentially because of technology
- If you close one area, users will find other spots for use
- Potato Salad Hill, if you close it people will find other areas
- Potato Salad Hill is close to homes & impacts neighborhoods
- Keep Potato Salad Hill but mitigate impacts to neighborhood (provide parking)
- Motorized Areas may need to have sacrifice areas plan for areas people can go
- As visitor numbers increase, conflict increases.
- Segregation of trails, i.e., Moab Rim smells of rubber; Portal Trail, more use
- Plan areas people will go t90 where there will be the least impact.
- Plan areas for heavy motorized use
- Travel Plan nothing remains open by default.
- Start with a blank map
- Identified purpose for everything left open
- Roads should be closed unless signed open
- Plan should incorporate user created trails.
- User groups should create a plan and bring it to BLM
- Should segregate multiple uses on trails. I.e. bikers next to jeeps. Should keep distinct uses on trails.
- Sound and Odor from OHVs
- Conflict also occurs between hikers and bikers Moab Rim
- Alternate Use Plans days issues with tourism
- Hiker/Biker conflict less of an issue but still in Hidden Valley and Moab Rim. Use by case bans
- In general, need motorized and non-motorized distinction.
- Should be converting existing motorized trails to non-motorized. Beginning with Class B roads
- No cross country travel no open areas
- White Wash sand dunes should be closed to cross country travel
- Some whole areas should be designated for specific uses.. for example, Monitor Merrimack areas.
- Motorized could use one half, non-motorized the other
- Topography can lend itself to use decisions
- Need to consider resources –health of resources before designations for uses.
- Study resources first wildlife, riparian, vegetation, soils
- Start monitoring programs
- Consider designating as a National Conservation Area

#### Rock hounding

• Want accessibility for rockhounding – keep open discussion with BLM; maintain accessibility

## Group 3.

## **Topics Listed for Discussion**

Management Actions Grazing Oil and Gas Special Designations

### Grazing impacts:

- I.D. sensitive areas, wildlife allocations
- Look at lease buyouts
- Consider drought conditions
- Sagebrush loss
- Monitoring, (seasonal) and management response to current conditions

### Management Actions:

- Education
- Recycling
- Determine where uses are appropriate based on biological values/science
- Balanced approach
- Manage numbers, permits
- Climatic conditions drought
- Motorized use closures determine some areas
- Consider increased impacts to remaining open-use areas
- Maintain current access/use areas
- Planning for numbers of people in biologically sensitive areas; e.g. jeep safari to limit permits/participants; id sensitive areas where use could be limited through permits
- Education
- Mountain biking vs. motorized use
- Limit new trails
- Monitor high-use areas, use enforcement & fines
- Use of signs to educate and enforce with fines
- Motorized use noise is issue

## Oil and Gas Impacts:

- Consider severity of impacts
- Implement least impacting technology possible
- I.D. areas where aesthetic impacts would be lest
- No mineral development in critical watersheds
- I.D. areas where biological values would be least impacted.

### Special Designations:

- Wilderness: issue is important, WSA, needs more consideration is what we have enough? Should there be more?
- Retain ACECs nominate new proposals
- What should the BLM do with WSAs if they are dropped from consideration?

## Group 4.

### **Topics Listed for Discussion:**

Land Exchanges

Recreation/OHV/Transportation

Minerals

Grazing

Process

Cultural

Noise

Vegetation/Watershed

**Special Designations** 

### Cultural:

- Rural history preserved
- Archeological sites listed
- Involvement with tribes part of MOU

## Grazing:

- Historical use of land/grazing
- Shorter use of land with drought continued program
- Enforcement of grazing regulations
- Grazing effect on vegetation
- Protect spring sources from cattle long-term project

### Land and Realty:

- Facilitate land exchanges to make management easier
- Better familiarity with boundaries between state/federal lands (trust lands)
- Access to trust agreement document
- More attention/time to land exchange
- Better process for land exchange perhaps appeals

#### Mineral Development:

• Continued income from oil and gas and mining

#### Noise:

- Protection of public experience no excessive noise pollution.
- No to non-necessary helicopter use
- Upstream motorized travel
- More enforcement on mufflers from motorized vehicles this is a main issue between
- Hikers/motorized vehicles

#### *OHV/Recreation/Transportation:*

- Continued recreation, like mountain biking
- Appropriate control of ATV use

- Appropriate use/control of mountain bikers
- Limited to designated roads/trails
- Travel plan is critical
- New extreme use of land (sports –activity) approach with caution institute permitting process for extreme sports for example make them pay for any rescues
- More/better signage
- Road issue needs to be settled before a strong RMP can be developed
- After ownership of roads is finalized, how will the BLM construct a productive travel plan

#### Process:

- Local BLM decision maker
- More discretion/less dictation from Washington
- Local input case-specific solutions
- Education/publicity of FLPMA and its philosophy
- Local government is not just another vested interest they have a role/place in the law and policy development
- More decision-making on local level
- Land managed for the American public
- BLM articulate their intent/what their mission is
- Conservation versus preservation example flexibility in land use
- Regulate issues instead of stopping use e.g., drilling management instead of no drilling; muffler regulation instead of denied access
- Long-term resource protection should be maximized

#### Special Designations:

- Wild/Scenic Rivers West Water Canyon Colorado State line to Dewey plus Dolores River
- Adequate public input to the designation of wilderness
- Wilderness preservation of wilderness quality

### Vegetation/Watershed:

- Protect relict plant communities such as Castle Valley butte tops (top of butte) or plant communities of scientific value
- Relict plant communities considered as a value use for scientific studies
- Watershed protection Castle Valley & Spanish Valley
- Flooding

# Monticello, Utah Open House October 21, 2003

#### **Written Comments**

Process – Do focus groups with separate groups for different interests (environmentalists group, grazing group, economic group, etc.) so that can have more in depth discussion of issues of interest to that group.

Wilderness values – there need to be some curtain areas that are off limits to recreation, economic and other issues, but there need to be limitations on these areas. Millions of acres in just the State of Utah alone is not the answer. This is too much. Remember multiple use.

We love this part of the country. We feel that the people who live here have the most concerns and care for this country. We want people to be able to enjoy it and not limit it to the extreme views of the environmentalists from back east with their money and power.

The BLM's RMP needs to protect designated and non-designated wilderness areas by the following:

Protect existing roadless areas
Address the travel plan as an inherent part of the RMP
Inventory & monitor existing road system
Minimize the expansion and opening of new roads and trails by ATV users
Close new, illegal ATV roads/trails

Do not allow expansion/opening of new trails on existing trails that are really old tracks that have not had significant (daily) use. (old geoexploration skid roads should not be opened to ATV use. "202' areas should be reconsidered into the travel plan and many should be protected as wilderness/roadless areas.

Why is BLM against range mitigation projects?

Allow permittee to improve range with BLM or on down.

Flexibility in time of use – flexible on dates and out dates of livestock

The Wild & Scenic River Act is a joke. Some of the areas even considered as WSA's is ridiculous. Most of the WSA's don't really meet wilderness criteria – roads (2-track) re-seeded, brush control, etc.

ACEC's do have their place. Especially historical or cultural sites. I don't believe "spotted owl habitat" should be an ACEC

The terminology "wild" is a misleading to most people. The rivers and country should be accessible to all people.

I am an ATV user. I would like to see all currently used trails and roads to remain open to ATV use. Also I would like to see more trails opened especially to connect trails. My wife and I use ATV's to enjoy the vast and beautiful country in San Juan Country. This is the only way we can do this and so we feel it vitally important to have an adequate trail system throughout the country. I will send in additional comments on specific areas and specific trails.

I lived on Hatch Point for 10 years in the winter months. I am very displeased with the plan that has been written concerning the management of the area. Especially the gathering of fire wood. This is totally ridiculous. I disagree with the Canyon Rims SRMA.

There seems to be a trend where the "environmental" concern makes major over reaction type policies. Closing lands to wilderness areas where no one can benefit or enjoy- except by walking through on foot seems ridiculous to me.

At the conception of the BLM/Forest Service, the mission was multiple use. Now the philosophy – lock it up, close it to everything to protect it from us.

We can use the land and keep it environmentally in tact at the same time. It is possible. Above all: Let the people who live in the areas decide how to manage it – not people that live across the country. People who live in an areas have a reason to protect their areas, their own use/enjoyment. Let's enjoy the land, not lock it up.

This is beautiful country that we love. We are over 70 and the only way to see it is on ATV's existing trails. We expect people to take care of the country and not destroy it. We like the theme of a "land of many uses" which would include it - we want it to stay that way

It is far easier to repair trails than manage closure of roads

The BLM has not controlled the spread of musk thistle in T29S R 24E, however, they have required private owners to do so.

In Valley of the Gods, we hope to keep the visual values for the thousands of visitors we have now and for all of us and our children in years to come. This is a sustainable and valuable use.

No more wilderness.

Keep livestock grazing in plan – no cuts

Keep oil exploration in plan

Keep ATV's on designated trails

Put your front feet up and keep the no use environmentalists at bay

Keep firewood cutting open – even on Hatch Point.

I use BLM for firewood gathering, horseback riding, hiking, hunting and just pure enjoyment

I worry very much about the non-use groups putting a hold on all activities except "Their vision of Pristine."

Please manage the land according to True Science and not Pure Emotional.

Spotted owl habitat is just that. Could be habitat. Could be Anasazi habitat too. But they are gone. Que. No?

Wilderness! No mention of the #1 use of this land? We need all 202's, WSA's and the uninventoried lands inventoried and documented by citizens groups to be designated wilderness and get illegitimately developed and maintained roads obliterated. That includes Arch Canyon, Piute Pass, Jacob's Chair/Short Canyon, Bridger Jack, Fall's Missile.

All motors should be restricted to designated roads outside proposed wilderness.

There should be no open designations for motor vehicle use anywhere. Travel plan for OHV's is imperative. Don't put it off. Closed motorized use of Arch Canyon, Moki Canyon. No motorized use in any riparian areas. Moab jeep safari should be limited to permitted use only --get the fringe element out of there.

In your deliberations give special consideration to the long range effects of the drought from all uses of public land.

Patrick Madigan, the Area Manager, needs to be at the SLC meeting for RMP revisions. The San Juan RA should not be guided by someone who has input from a few people in a country with a history of land abuse alone.

My vision for BLM lands and resources, for the next 15 years, includes less abuse and more protection of resources. There is room for ATV's but not everywhere. County roads should be free of ATV's. They don't mix with full size vehicles.

I use BLM lands to hike.

Reduce the number of ATV trails

My concerns are about the explosion of destructive uses and the lack of concern for the natural resources.

I strongly think that public lands should be open to the use of the public. I strongly oppose any more wilderness in San Juan Country and in the State of Utah. I believe it is absolutely wrong for these wilderness groups to think that they are the only ones that should have access to the land. I believe there should be room for ATV's cattle raising, hiking, horseback riding, oil drilling, forests for lumber and all other uses.

I want to see multiple use continued. We have plenty of area for everyone to enjoy this beauty we are surrounded with. I use if for hiking and 4-wheeling and sightseeing. I would like to see the dead pinion trees cut and used for firewood or some other use.

Dead trees, not enough trails, plenty of wilderness areas.

My vision is one that covers the land for public use, recreational, and other use and also for the protection and beautification of public lands.

I use the land for recreation both by foot and by motored vehicle. I love this land and I have lived here for the majority of my life. I believe that it is our right and responsibility to use the land widely and responsibly.

I would like to see the OHV trails systems continue to be used and maintained. I believe that through responsible use these trails could continue to improve the economy for this area. My concerns are that the groups that want to discontinue use are wearing blinders and need to take the big picture into view.

Livestock grazing needs to be enhanced so that the local ranching economy doesn't suffer

Please protect the public lands. We already have enough roads and ruined land. It is past time we protect what is left from development.

I'm for meaningful multiple use – not to exclude any valid use. This world is for all our use and benefit.

Note that areas of Kane Springs, Dead Horse, Natural Bridges, and Dark Canon are areas of high biological diversity and often have been recognized as areas of critical habitat for a number of species. These areas and their ability to sustain viable populations of threatened/endangered species will be degraded by oil/gas exploration/extraction.

I want to express support for withdrawal of mineral/oil exploration/leases that are currently in the works and suggest that further efforts be put into more withdrawals /buyouts in the above areas.

Recreational offroad vehicle use and extractive industry use (cattle grazing allotments, oil exploration & extraction, of marginally productive assets) must not degrade the ecosystem structure, function, and processes. An example of degradation includes cattle damage of springs in Lavender and Davis Canyons. BLM must withdraw allotments. ATV damage to Arch Canon – restrict ATV access to minimize further damage.

Failure to access, mitigate and limit degradation will result in negative impacts to endangered threatened species and their habitat and will constitute a failure of the BLM to properly manage for species/community viability.

Only areas of over use (whether human, domestic livestock or wildlife) should have some restrictions of use. Riparian areas can and should be used but not over used. Don't let emotions over rule true science.

During severe drought all grazing areas should be monitored closely or an individual unit or basis.

Some pastures may have been rested for a year or more and may have usable forage.

If this areas hadn't been settled for ranching much of the wildlife we have here today wouldn't be here in such large numbers. The improvements (water, brush management, grazing management, trails, etc.) have helped wildlife.

San Juan County is diverse and spectacular scenery and landscapes and as such no blanket policy should be enacted to govern all needs – a vastly varying entity. Must of areas is geographically isolated and wilderness by its shear existence. Designation as wilderness only draws more attention and visitation to fragile ecosystems. A wilderness designation is a symbolic gesture in futility.

Thousands of acres are prime resources for cattle and wildlife – these should be cultivated and maintained by chaining, fire, and reseeding. Wildlife and even threatened species benefit from the cattleman and his efforts. See current resource material regarding the coprophagic Desert Tortoise.

Overlying factor in creating the BLM was balanced multiple use and viable access. Nature is dynamic and has flourished post cataclysmic events, to hold man culpable for dynamic shifts and try to eliminate him from the equation is purely a vain imagination.

If people are critical of ranchers obtaining a living from the land, they should also be critical of ecotourism, river guides, etc.

I recently saw in a national book store a guide to Anasazi ruins complete with GPS coordinates – I was sickened to see how a living was made off poor environmental stewardship

Continued multiple use is warranted and should be invited. No groups can hold a monopoly of love the for the land. I am an active environmentalist, not an environmental activist. I'm for the enrichment of the land, not for shear control in a biased manipulatory fashion.

Public lands are public. Responsible multiple use is the only appropriate use of the land.

Recently the San Juan area hosted the ATV Safari. It was a big success – because there were many participants who were able to enjoy the magnificent country and fabulous sights on a ATV that would not have been able to do so on foot.

Making more wilderness will take away from the state's school trust lands. We already face enough cuts to the education system without losing these lands. Please consider the disaster it would be to loose any money the state would have for educating our youth.

## **Small Group Discussions**

(Four Groups)

### Group 1.

## **Topics Listed for Discussion**

Issues Recreation use

Grazing

ATV Trails

Commercial Recreation use

Right-of-way/Road ownership

Wilderness values

Wildlife

Water rights

Woodlands/forestry

Range management

Mining, oil & mineral extraction

Cultural

#### Cultural:

• Cultural – implement the National Historic Register requirements for protection of sites, figure out what sites qualify and don't let the other get in the way of projects. In other words, don't protect everything.

### Grazing:

- Grazing should stay multiple use
- Grazing repair the stock tanks and water collection system
- Grazing important to economy
- Allotments keep off some resources

Archeological

**Springs** 

Critical habitat

But those things may not be important to grazers

- Springs should remain open to grazing
- RMP should give priority to historical economic impact
- Economics are critical
- RMP should look at alternative ways to benefit economy, such as,
- grazing allotment buy-outs
- Water rights buy outs for wildlife
- No chaining of pinion juniper
- Use prescribed burns for range improvement and wildlife use
- Support increase in prescribed natural burns
- Tax hikers to be for burns
- BLM could better use fire suppression funds for other purposes, such as

Rangeland

Trails

- BLM should be able to override environmental groups
- RMP should favor local values over national values
- Local community has long term interest in economy

### Mining, Oil & Gas:

- BLM should close mining claims not being used and opposing, leave open
- Mining should not degrade

Air & water quality

Scenic values

Ecological integrity

- Mining helpful to the economy
- Take recommendations of BLM and not environmental groups
- BLM need to be "on the ground" managers not in the office

#### Recreation Use:

- RMP should address RS2477
- If we find an existing road, can we ride on it?
- Existing roads should be kept open to public use
- Travel Management Plan should be written into RMP not put off. Can address a lot of issues
- Can't separate land issues and travel
- Inventory of existing roads
- Need more monitoring
- Inventory of roadless areas
- Would like to see RS2477 resolved
- Is there a way for BLM to adjust season of use to protect health of land?
- Inventory of roads, road use, roadless can help resolve 2477
- Try to define roads by category
- Why is commercial use designation so critical?
- BLM should welcome permitted use
- Commercial viability ties to local economic base BLM should: better process; better
- permit commercial use
- Upgrade mapping system so know where they can go.
- But, publication could increase use could have negative impacts. Could also have positive impact, people will know where they can and can't go –need proper signage
- Better dissemination of information

Low impact camping

Riparian areas

Leave no trace

- Most ATV users want specific trails
- Should be a happy medium between closed and open
- Hunting: cooperation with other agencies
- Signage

• Use free areas (that is no use): ATVS

Riparian

Critical habitat

- Archeological areas
- Sensitive soils
- Existing roadless areas
- Enforcement should come from County & State officials no federal law enforcement
- Need more enforcement
- Closure or investigation of impacts needs to occur at:

Arch Canyon

Dome Plateau

Hook & Ladder Draw

Moki Canyon

**Short Canyon** 

Jacob Chair Loop

Bridger Jack Mesa

Piute Pass

- Should be separate trails for ATV users
- Would like a trail from Shay Ridge to Cottonwood Wash(?)
- Indian Creek area between Mt. Road up to Shay Mt. then north should be re-opened for all use.
- There should be a way to get from Blue Mountain to North Cottonwood
- Closing trails could impact other areas.
- Arch Canyon there has been a road for 60 years with no damage.
- There can be ATV use with no damage. 90% of ATV users stay on trail.
- Repair damage and people will stay on trail.
- Difficult to police closures example: Grand Gulch to Dark Canyon was designated
- Use, trail became formalized
- RMP should avoid labels special designations

## ROW & Road Ownership

- County should maintain ROW and maintenance
- All needs to be tied to travel management
- Other view in some cases BLM should maintain ROW

#### Wildlife:

- BLM should be some means to limit DWR control
- BLM should consider not allowing use where wildlife is threatened (critical habitat)
  Canyon Rims

Cedar Mesa – currently off limits – but hard to enforce

• Conflict between ATV & hunters – find solutions

Timing – at different times when beneficial to hunters, restrict ATV use

- Control Wildlife same way as grazing permitting
- Wildlife has inherent right to resources

## Group 2.

## **Topics Listed for Discussion**

Grazing

Off road ATV's

Access

Wildlife

Watershed

Wilderness

Protecting the land for the future

Conservation /not preservation

Socio-economic impacts associated with land management

Oil & minerals

Scenic values

#### Access:

- All people, not just special interest groups horse, foot, ATV, etc. with state/federal guidelines
- Keep motorized vehicles on designated routes
- Expectations for pristine areas are varied by different user groups
- Wilderness means different things to different users
- Access needs to take wildlife & vegeation into consideration

## Conservation, preservation, future

- Wise use conservation, preservation non-use
- We need to use wise
- Farming conservation practices
- Non-use, deterioration (except wilderness)
- Will our future generations be able to ranch?
- How can the land be preserved to protect?
- Get animals to eat tamarisk

### Grazing:

- Currently too much conflict
- Increase BLM field involvement with permits
- Grazing too emotional; limited science, dated science, mis-information from
- environmental groups
- Base policy information on field experience
- Accurate science for each permit area
- Increase Congressional spending for range management on BLM lands increase
- More infrastructure & staff
- Permit should not be penalized for protecting range
- Work more with permittees in partnership for range conservation & wildlife
- Better monitoring base management on science
- No poison in range management

- Encourage win/win buyouts for conservation need to coincide with Federal laws
- Tamarisk, Russian olive rabbit brush, snake weed eradication
- Standard of no impairment for riparian areas.

## Off Road ATV's:

- ATV Safari win/win good participation, annual, respected the land
- Open up more ATV trails designated trails
- Encourage self-policing among ATV riders
- Education outreach, state ATV laws more training with young riders
- Access for non-hikers ATV provides
- ATV's on designated routes only
- Set limitations on numbers of designated ATV events (example 100 participants /event or more)
- Designated managed ATVE areas (with trail heads, staging areas, trail system)
- Close illegitimate routes, write new trail proposals with economical considerations
- Increase monitoring as number of riders increase
- Comply with state & federal guidelines

### Oil & Minerals

- Integral to local economy
- Present RMP's stipulations are inconsistent, need to be consistent
- Marginal oil & gas potential should not trump scenic wild land values
- Oil is in every part of San Juan Country, should be produced where economic vitality can be realized
- Extract the resource without compromising the scenic beauty keep government
- Guidelines in place
- Restrict camping rims and basins
- Keep future economy in consideration in the decision-making process

## Socioeconomic:

- Open to alternative forms of energy in region
- Tourism important in local economy
- Tourism for many is a subsidy
- Local existing economy cannot support next generation with employment
- Consider decision-making process that will have a positive impact on local economy

Maintain rural character

Need local input

More local meetings

Form committees with local populations in decision process

• Scenic wild lands are the greatest asset – everyone needs to be able to enjoy—all access

#### Watershed:

- Protect integrity
- All agencies working together
- Use all the resources

#### Wilderness:

- No more designated wilderness areas in San Juan County
- Increase designated wilderness areas in San Juan County
- Better wilderness inventory policy get more local input from residents who will directly be impacted
- Evaluate designations for a socioeconomic impact
- Don't use wilderness to hurt the local economy

No grazing

Shutting mining & drilling

Tourism – negative due to limited access issues

- Wilderness could impact economy in a positive way
- More wilderness can impact land owners in a negative way
- Buffer zones can become issues with wilderness
- Ripple effect on locals (potential) with new designation
- More wilderness can be magnet for economy
- Keep status quo with new wilderness areas
- Unique place protect WSA's, 202 areas, citizens inventory wilderness

### Wildlife:

- There isn't any wildlife; more BLM staffing and science
- Needs to be more wildlife fieldwork, less desk work;
- Staffing too much work; not enough staff boondoggle
- Staffing/budget issues: inventory/monitoring

Threatened & endangered species

Indicator species, elk & grouse

- Better understanding of state/federal government management of wildlife
- Protect unmanaged populations

## Group 3.

### **Topics Listed for Discussion**

Water Resources

Recreation

Access

Cultural

Mining/Oil and Gas

Wilderness values

Grazing

### Access:

- Access for all
- Controlled access
- Use should occur on trails & roads
- Consideration of riparian areas when determining access

Type of recreation

Time, place & size of group

During sensitive times

Concern about potential loss of access – example – WS

#### Cultural Resources:

- React to increase awareness of cultural sites
- So much, too much education
- More monitoring
- More stabilization money
- More awareness education
- Ranchers are regulated, but writers aren't
- Consequences are forever and are limited/ineffective
- Promote "site steward" program adopt a cultural site use volunteers, local involvement

### Grazing:

- Be proactive with grazing improvements
- Reseeding
- Reservoirs
- Process & consideration of requests
- Land designated as grazing should remain as grazing
- Does scientific data & education of range specialist have as much important as emotional
- Data on grazing
- Decisions should be based on facts & data
- Create local grazing groups HRH Doable Trust
- State/local/federal/general public
- Local land use discussions with grazing

- Involve locals feel better with input
- Laborious difficult process (requests for grazing improvements)

## Mining, Oil & Gas:

- Any exploration or development should stay out of critical water shed -- & riparian areas
- Use vs. abuse need professionals to manage need to be able to do job
- Develop minerals plant to look at old impacts areas first to see if there are resources available with new technologies find additional resources before going to new areas
- Wind farming north of town is Lisbon valley a location?
- What would be the economic impact of private wind farmers
- Make gas & oil & seismic data available for deep water wells information

## OHV/Recreation/Travel Plan:

- Need travel plan
- No open areas for cross country
- Open access to be designated
- Roads & trails
- Balance between open and restricted areas
- South Green River Sand Dunes appropriate area for open
- This are doesn't lend to open access for ATV. Controlled use keep on trails
- Plan an adequate system plan loops. So people don't go willy nilly
- Consider cumulative impacts & foreseeable future
- Multiple land use ATV, horse, hiking, camping, solitude, 4 wheeling, hunting
- Fees for recreation
- Specific no ATV access for ATV or horses in Dark Canyon designated area
- Many uses may have to occur at same time Safari example multiple events
- Need schedule events better with agencies DWR/BLM hunter vs. safari
- Schedule events when there is more wiggle room in hotel/motels
- Coordination with cities and county and BLM
- A's

#### Water Resources:

- Public use: take special consideration of drought conditions & predicted future drought effects
- All decisions on use must take into consideration water resources
- Both positive and negative
- What is the normal baseline for this dry community?
- Proactive to save and develop
- New & maintain reservoir checkdams in washes
- Reseed areas to help slow down the runoff/erosion timing
- Question will removal of trees help restore sagebrush
- Just don't know when it will rain

## Wilderness Values:

- We have a national treasure
- San Juan can provide some solitude
- Values everyplace
- What is the definition of wilderness
- Uninhabited by people plants and animals thrive
- All uses can at planned times & places
- Manage areas locally for "wilderness" use identify
- Don't necessarily need legal designations
- Biological systems thrive: monitor use to ensure
- Definition of wilderness is confusing and everyone has a different idea.

## Group 4.

#### **Items for Discussion**

Recreation Mineral, Oil & Gas Development Range Improvement Cultural

#### Cultural:

- Seismograph damage on land, especially thumper trucks
- Stronger language on reclamation damage
- Socially significant items should be protected (Cedar Mesa is example)
- BLM find most significant sites (on register). Protect these sites. Prioritize sites and back with money
- Protect sites with designations wilderness designation, ACES, etc.
- Special designations damage cultural resources
- Impact on designations for cultural resources
- Implement National Historic Register. Evalu8ate sites based on NHRJ.
- What determines a cultural site?
- Better training of archeologists
- Consider local knowledge/impact in determining sites mitigation
- Clearer direction/identification for archaeology. Need clear direction.
- Archeology on private land in relation to minerals
- Heavy-handedness in designation of sites.

## Mineral, Oil & Gas Development:

- Mineral & oil & gas development needs to be considered as part of multiple use
- Not as many ACEC's or wilderness areas
- Too many special designations they prevent us from development minerals in area
- Weigh resources against mineral/oil development
- Look closely at ACEC and don't have full management dissection
- Disagree have more management dissection.
- ACEC applied across the board
- Drilling in ACEC pay the price
- Limitation on where mining is allowed
- Public input suggests need for limitation
- Some new/no conflict between mineral/oil and special designations
- Any roads created for mineral development closed to ATV use enforced by BLM
- Roads come out of Mining Act
- Citizens of this county deserve to get the resources from their area shouldn't have to ask feds
- Determine appropriate places for mineral development (weigh it against other resources)
- Disallow development in areas with WSA character

- Don't put land in non-use categories
- Make use of minerals under land if you don't lock it up.
- State balance in land
- More use of land for tax base and economic development
- Use BLM tools to protect wildlife, etc.

## Range Improvements:

- Control of sagebrush & juniper
- No eradication/control
- Not in favor of improved grazing
- Improvements on range with own money
- Control tamarisk
- Put money into range improvements
- Concern about water and money for water
- No endangered by improvements
- Control of predators, no increase shipping of predators
- State/cattlemen reduce herds equally
- Justify effect of projects on wildlife specific numbers
- Game herds should be managed
- No impacting of pronghorn, equal management for grazing and wildlife

#### Recreation:

- Use signs for open trails and sign for closed trails
- County needs to be involved in decision for trail designation (cooperation) so county can help police problem
- More/true integrated planning
- Better designing ATV trails water damns, wide of hill instead of straight down
- Public safety safe for travelers (trails)
- When designate trail consider safety issues
- Control regulations for recreation trail use should not be just for ATV hikers and hikers, etc., too
- No new trails created
- Trails designated for each use / default positions be any mark on ground is closed unless signed open for that use.
- Permits for grazing use on trails areas not necessarily open for use. Designated open makes people animals?
- Regulate/police public so they adhere to the designations (ATVE, mountain hike, etc., all users)
- Don't like the idea of closed unless designated open makes people animals
- Need regulation for safety
- Need more staff for recreation
- BLM don't encourage/promote recreation-use
- Should be open unless designated closed
- Recreation management zones

- Complete & designate & implement travel plan in RMP process
- Zone conflicts with mulitple use
- Eliminate overlap in special designations
- Need balanced recreation program that addresses /includes all uses including ATV example more ATV trails/parking lot/balanced approach
- Negotiation of BLM and local to have specific case studies/ scenarios to manage use and conflict (arbitrator between BLM &/or competing entities)
- Regulated recreation use before it is too late.
- Manage use between competing entities
- Regulation on ATV clear deferential
- Specific/designate places for ATV
- Identified/developed trails so people stick to them

# Blanding, Utah Open House October 23, 2003

#### **Written Card Comments**

Allow grazing

No more wilderness or wilderness study areas

Responsible use of public lands

Not abuse – No closures

Support motorized trails & clearly mark them instead of fighting use. Local economies heavily depend on motorized trails Jeeps need to be kept off of ATV trails ATV's must not use single track motorcycle/bike trails Hikers who cannot tolerate the sound need to do their hiking where motorized isn't allowed

Need better clarification of qualifications of WSA's –that would allow areas to either be designated or not without being tied up with non-use for years with out a reason. It shouldn't take that long

There are many areas labeled as WSA's that have roads, stock ponds, chained areas, reseeded areas, etc – clear disqualification for WSA

More ATV trails

Open all roadways

BLM should adopt Bookcliff Rattlers Motorcycle Club "Trails of Dubonky" trail system. All trails should be clearly marked. Vehicles that exceed trail width should be kept off.

The roads on Mancos Mesa are RS 2477 and they should remain open to ATV use according to Federal law.

As more of population gets older they still enjoy getting around lands whether on horseback, ATV, or 4wheel drive – these lands are ours and we need to have local control and access to them.

Grazing, mining, and ATV'ers bring in new money that pays taxes when you no longer have a tax base what are we going to do as a nation? When agriculture is strong, so is the nation.

Keep multiple use on all BLM controlled area. Do not close areas to specific interests only. For example, wilderness access for all. The elderly & disabled are being discriminated against by the healthy, wealthy, and wise that want every inch for themselves and people that feel the land should be kept for their grandchildren.

We <u>are</u> grandchildren of the people that opened this area, settled it, and made the roads they want to close.

Don't lock me out of my backyard. I'll share it, but I won't give it up.

We need more ATV trails, more grazing. No wilderness. Land is to be enjoyed and not just looked at. More areas for recreation. No closed grazing.

Mancos Mesa should not be a closed area. Too much oil & uranium potential also it is one of the few sites in American that can accommodate a nuclear power generator.

We need more ATV trails & grazing areas. No wilderness study areas. Land should be open for us to enjoy. Not to able to even use it for recreation.

None of the Blanding/Monticello Roads should be closed down. We need more places and trails to ride ATV's that way we can bring in more people to this part of this country.

BLM should honor their commitments and give to Utah land obligated from years past. Land trades require an exchange from both sides or it is grand larceny.

Some state school sections within some areas. Example, Slickhorn Canyon should be purchased or exchanged.

Multiple use and public access will best accommodate the largest number of tax paying citizens who wish to utilize public lands.

No further areas should be closed or placed under "wilderness study" status.

Existing roads should be left open

Tourism will never be the primary industry in San Juan County and areas should be left available for the development of other activities that will produce economic activity for the country.

Access to constant, reliable energy (electricity, petroleum) is the economic lifeblood of the U.S. Lands that have development potential for coal and or oil should not be excluded from consideration.

We need to find a way to bring deer herds back.

Keep working with the local people to provide solutions to the roads and trails and the use and repairs of them. It would be nice to see more "loop" trails developed and thus reduce the "back and forth" travel.

Continue open use and multiple use plans where ALL can enjoy the wonders of our lands and areas.

Driving around San Juan County roads I'm saddened to see the number of dead trees. It might be a good idea to give free wood permits to anyone who will help "harvest" the wood and clean up the limbs to avoid a big forest fire or range fires in the future.

It has been my experience and opinion that once an areas is designated as "wilderness" it becomes a "magnet" that soon draws an overwhelming number of people to that areas and it is destroyed by the same ideals or plans that were meant to preserve it. I believe the fewer wilderness areas we have the more OPEN and truly pristine land we can keep!!

Lifetime citizens of San Juan County – tradition of 4 wheel drive outings as a family – closing any route into the backwoods limits the area I can take my family.

Even though I do have ATV's, I am against closing existing 4x4 roads to ATV's only. Currently the only 4x4 trail near Blanding that I frequent is Hotel Rock; and I mention it to make the point that this kind of 4x4 road is as necessary as ATV trails or hiker only trails.

Thank you for protecting my right to access.

Land use issues should be weighed heavily by BLM with respect to local economies and cultural uses. If hunting and off-road use has been the norm in these areas, that should weigh heavily in

the BLM decisions concerning these areas. Outsiders who come in and change the way the locals have done it for 100 years should not have as much impact on decisions.

Preserve some primitive areas for roadless.

Consider short places where existing roads can be joined to create loops.

Develop a program to eliminate or control predators. Provide a coyote bounty.

Resolve the WSA's – that is just a land grab. Where evidence of human development exists, remove these areas form wilderness consideration – roads, drill sites, ponds, salt grounds, mining development. Do away with study areas – we have enough wilderness.

I want to see govt. agencies facilitate resource exploration & development instead of an adversarial role.

I want to see educational programs in schools teaching respect for the environment & natural resources – don't be a litterbug program is an example of success.

BLM does an excellent job protecting archeological resources.

Restricted areas are not truly public property – they are exercises of private property rights and should pay property taxes to the country : example, Grand Staircase

No more wilderness in San Juan county

Don't close any more roads or trails in San Juan county

Open trails into Dark Canyon, Lime Ridge, John Canyon for people that can't walk.

Open oil & gas drilling

Base decisions on science & sound practices

Manage for multiple use

Keep historic access open

Manage the specialists

Get out of the office and manage the resources. You may find that not so many rules are needed.

We do not need any wilderness. We did a good job with out lands before wilderness & will continue to be active in preserving our area.

All WSA's (post 1993, too) should be managed as wilderness. No motorized use or road/trail maintenance.

I want to say "no cows south of I-70". However, adherence to grazing plans, protecting riparian areas and limiting stocking will have to do for now. Encourage permittees to consider the voluntary permit buyout now before Congress. More serious monitoring.

OHV's – BLM must develop a meaningful OHV management program – soon! Several sacrifice areas should be designated. Adopt a "closed unless marked open" policy. Work with volunteer monitors. Make penalties meaningful.

Non-motorized recreation is very important in San Juan County. Don't let outlaw OHV'ers ruin in. All WSA's including post 1993 should be managed as wilderness.

There is so much multiple use areas as compared to wilderness areas. Wilderness areas need more expansion and buffer areas to protect them.. Wilderness will become more

valuable for the economies of this area in the future.

Grand Gulch area should receive wilderness expansion.

Non-motored land use (hiking, etc.) is more sustainable and less destructive to the landscape.

Expansion of OHV use will be a negative impact on the economy and the landscape.

Off road vehicle use is a major problem in many of the riparian habitats. Areas will Arch Canyon should be closed to such use.

The Cedar Mesa/Grand Gulch Plateau needs much more protection from OHV usage. Comb Ridge should also receive a much higher degree of protection from OHV use.

Cultural resources and preservation of the landscape are too threatened by OHV use.

WSA's deserve full protection. Many of these areas should be added to this nation's wilderness designation.

Comb Ridge and the Grand Gulch/Cedar Mesa Plateau are areas of critical concern. Give them the utmost protection.

Tourism – "the leave no trade type" is the economic future of this region. People don't visit this region to sees spoiled landscape.

Our public lands are a tremendous resource for multiple uses. We live in a beautiful areas that should be experienced by all who would like to see it. Access must be kept open. There are also good resources for ranchers for grazing which, if managed correctly, actually improve the land and wildlife habitat. I know I own livestock on private ground and see the benefit they provide with proper management. I also believe that with new technology and proper management, natural resources exploration and development can exist with good environmental management. Land is abundantly filled with so many resources that if completed managed will continue to produce, remain beautiful, and can be accessible to all. We must take care of our resources and use them wisely.

Section 202(9) of the Federal Land Management Planning Act states "To the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies of the States and local governments within which the lands are located. Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act.

Reference the San Juan County Plan relative to RS2477 access rights-of-way, mineral potential areas for oil, gas, potash, uranium, vanadium and copper.

## **Small Group Discussions**

(Four Groups)

### Group 1.

## **Topics Listed For Discussion**

Recreation

Mining

Grazing

Wilderness

Cultural Resources

Tourism

Geophysical

Water Resources

OHV

**Economics** 

Wildlife

#### Cultural Resources

- Where wilderness does not existing need to protect cultural resources (Butler Wash, Arch Canyon, Cedar Mesa)
- Protection of resources (fencing, fines, etc.)
- Current laws are adequate
- Visitation without destroying sites.
- Slow degradation b limiting access. Would promote tourism by protecting sites.
- Having activities at site would decrease vandalism also opposite having activities would increase vandalism
- Work in cooperation with volunteers (Adopt a Site)
- More public education in schools, to preserve sites. Don't be a litterbug.
- Continue to address native American issues on sites.

#### **Economics**

- Encourage seismographic studies
- Allow oil (1995) leasing, (Lockheart Basin)
- Look at renewable resources of tourism
- Realistic about existing resources

#### Geophysical

• Follow 3150 Handbook or re-write it

## Grazing

- Be able to improve grazing (seeding, chaining, burning)
- Drill for water wells
- Monitor grazing allotments more closely (uplands & riparian ) adjust grazing allotments

- Maintain access to WSA's to current improvements
- Protect cultural resources in relationship to grazing
- Springs out existing water resources. Will help alleviate pressure on grazing
- Maintain reasonable. AUMs.
- Water needs to be developed for people wildlife and grazing
- Develop predator management program. No extermination.
- Permittees use own dollars for improvements
- When BLM money is limited be able to use own money

# Mining

- Federal Government should facilitate mining issues
- Federal Government should pay attention and allow for mining
- Study each area for mining issues. Other issues should be addressed
- Allow mining leases. Responsible Review
- Water quality monitoring (ex., CBM)
- Allow mining/leasing in Lockheart Basin
- Use mining methods to preserve scenic vistas
- BLM pay attention to reclamation /mitigation
- Allow exploration to support local economic
- Watch all sectors of economy
- Allow more opportunities for development of gravel resources. Keep close to local economy
- Nakai Dome and Cedar Mesa for exploration
- No exploration in Cedar Mesa because of WSA's and tourism

#### OHV

- Develop, mark, map trails for less cross country travel
- Enforce designated trails
- Permit procedure for off road access. Model after BLM Montana state office plan.
- Connect trails for less damage (Based on San Jan County and SULA proposal
- Education program for in/out of state hunters
- Maintain large areas as non-motorized
- Provide for open riding areas (Butler)
- Access areas for OHV use (Indian Creek, Bridger Jack Mesa, Lime Ridge)
- Plan ahead for increase use of mountain bikes (designate trails)
- Do not develop trails on Lime Ridge
- More access for Cedar Mesa

#### Recreation

- Consider present resources (roads, trailmarking, roads accessible in loops, Title 5)
- Licensing bikers, OHV's ATV's
- Relationship between recreation and economics
- Address potential for user conflicts
- Large rec. areas w/out motorized access.

- Access for people with health issues. Areas for all access (jeeps, bikes, etc.)
- Don't limit use of public lands
- Wilderness areas should not be open for all access.
- Don't want to lose access to wilderness study areas. Clarification on what is considered a road.
- Public comment on what is wilderness.
- Side with majority
- Lands belong to everybody
- Local citizens should have input, weighted towards local input

#### **Tourism**

- Tourism brings in outside money.
- Tourists need access to sites. (Marking and mapping of trails)
- Maintain pristine atmosphere of sites. Provide different experiences for different tourists.
- Do not increase access (Cedar Mesa, Comb Ridge)
- Provide staging areas (White Canyon, Paiute Pass)
- Do not provide staging areas (No OHV use, no need for staging areas)
- Approved areas for ATV's need staging areas

#### Water Resources

- Riparian areas need more protection. Will come back if protected.
- Protect water resources in relation to drilling.
- Facilitate water development through abbreviated cultural resources studies and opposite need full studies
- Allow cutting, thinning for forest fires
- Use fire as a tool

### Wilderness

- No more wilderness
- Need more wilderness

# Wildlife

- BLM needs to work with DWR on monitoring game numbers
- Look at other wildlife besides big game

## Group 2.

### **Topics For Discussion**

Firewood Gathering Special Designations

ATV's

Habitat for Wildlife

Oil & Gas

Grazing

Road closures

Cultural Resources

Recreation

Fire Management

Mining – same as oil & gas

Watershed

Special Designations

### ATV's

- Coordinate more with Forest Service on Trails fore example Texas Flat
- Consideration facilities and trails and signs for signs
- Across Resources everywhere in county
- Where they are allowed Existing Roads & trails (RS2477)
- Where they aren't allowed Off trails
- Off roads --- damage to vegetation
- Enforcement
- Consider loop trails develop new trails for access new loop trails (with Forest Service?)
- Areas are signed "no access" Cedar Mesa consider opening –
- Want ATV on existing roads in WSA

### Cultural Resources

• Concentrate on protecting sites that qualify for National Historic Register only

## Fire Management

- Allow firewood gathering can help clear areas as well & (for Navajo people)
- Need to be allowed to cut dead standing trees
- More control burns dead trees & brush control dead stuff
- Maintain chaining
- Nature first protect sites & buildings & then let it go

### Grazing

- Improvements to reduce erosion and need grass cover to range
- Water need to develop springs wells are not the best idea
- Because of EIS takes too long
- Burning to create different stage of vegetation consider Harrow.

- Nancy Patterson pond gate is locked cattleman need key
- Natural corridors for trees, cattle, wildlife
- Compensate loss of pinion management treatment
- Reseeding
- For wildlife & livestock control bur and ponds.
- No wolves or links on BLM land. If they appear, kill them
- Clean Ponds reviews areas. Cisco (this is Moab) Cedar Mesa & dry Mesa
- There is no water for wildlife
- Put more money into the range projects maintain old allotments.

### Habitat for Wildlife

- Ditto for grazing
- The better developed habitat for cattle directly correlates to better habitat for wildlife
- Good example of coexistence Black Mesa
- Control cheat grass
- Predator management
- Stronger lion/ bear/ coyote/ Need to give deer herd opportunity to come back
- Range management in check

#### Oil & Gas

- More oil & gas exploration & development for economic purposes
- Neglected, needs attention money
- Whole resource areas wherever there is potential
- BLM permit process is cumbersome
- More lenient where you can
- Least intrusive way possible to explore & develop

#### Recreation

- Develop more fisheries on BLM land develop habitat for fish in lower Indian Creek, South cottonwood, North Cottonwood, Johnson Creek, Montezuma Creek
- Reintroduce beaver
- Provide jeep & ATV access on existing roads in areas Cedar Mesa, Red Canyon, Dark
- Canyon, Beef Basin, Mancos Mesa
- Once trails are open, need enforcement
- Forfeit vehicle if you drive in roadless areas
- Some commercial guides are not getting permits and are not getting penalized
- Work with Sheriff, state legislature to pass legislation to allow enforcement
- Helping with the cost of search and rescues
- Fees for non-residents to recreate work with legislature

#### Road closures

- Creating a hardship for seniors & handicapped to get back to see the areas
- BLM leave roads open until RS 2477 is resolved

# Special Designations

- Reduce the number of designations & areas of overlap
- Restrictions vs. multiple use use all areas to the fullest extent
- Minerals activity should not occur in these areas
- Habitat improvement limitations on grazing permits in the areas need to change

## Watershed

- Need wells
- Need dams
- To develop more water sources for livestock, fishing, wildlife, & recreation
- Control erosion all over use ponds & checkdams & maintain existing & add new reseeding projects and control head cuts.

# Group 3.

# **Topics Listed for Discussion**

Grazing

Big Game

**Motorized Trails** 

BLM Work

Protected Land

**Not-Motorized Trails** 

Recreation

Natural Resources

Timber

Mining

Economy – local

# Big Game

- Similar issues addressed by grazing
- Range needs to support cattle and big game
- Improvements needed not at the expense of one or the other
- To avoid conflicts with cattle ranching and big game –
- Important to equally consider all wildlife

#### **BLM Work**

- Illegally managing by closing lands (back country 10 mile wash)
- Increase personnel if involved in law enforcement
- Lawsuits deter effectiveness permit process

### Economy - local

• All uses are tied together – number of public lands in areas – help locals to become more sustainable economies.

# Grazing

- Support same number of cattle on less acreage
- Other vegetation has taken over grazing due to lack of natural selection
- Change/adjust, modify so greater populations
- Prescribed burns
- Chaining Railing -- all to improve grazinglands & stop erosion
- Address conflicts on rangelands between motorized & mon-motorized & mineral development
- Build water cachments and develop water
- BLM staff needs greater lateral movement with changes in how wildlife/cattle are being managed
- Address protection in riparian areas in relation to grazing

## Mining

• no more uranium

#### Motorized Trails

- Keep existing tails open
- More clearly define what existing /legitimate trails
- Make all trail (existing) legitimate, for example, trails that BLMN currently does not recognize
- More jeep trails
- Extensive planned looping and connecting trail system
- Designation in RMP of all designated trails
- Flexible additions to the RMP
- Conflicts considered prior to designation
- Prior to issue, consider conflicts -- issue commercial permits in prompt process (give or deny promptly)
- Commercial outfitters guidelines are too stringent
- Consult with grazing permittees before organizing trail system to avoid conflicts
- Increase fines /penalties for people making illegal trails
- Designated trails for specific users ATV/Jeeps/hikers, etc.
- Use designated trails
- Some small open areas

### Natural Resources

- Oil and gas
- Research more what's available locally
- Limit development to existing fields/infrastructure
- Limit seismic exploration, no large scale
- Do not limit the access to resources for research
- reclaim all oil and gas areas that are no longer in use
- keep routes that continuous open, if mining/oil/gas closed
- close old mining oil gas roads
- reconsider oil and gas classifications

## Non-Motorized Trails

- Evaluate existing trails and for some, convert motorized into non-motorized, ex.
- Horseback, hiking, -- to improve primitive recreation /hunting experiences
- Do the reverse of the above
- ATV's should not be on trails with hikers, motorcycles, bikes due to increased ATV
  users
- and larger track sizes
- Non-motored trails should be wilderness areas

#### Protected Land

- Locals don't misuse lands, it is outsiders
- Too many study areas, example, search & rescue cannot get into some areas
- Study area should not be closed what is the needed time for the science
- Consider additional wilderness designation areas and other management prescriptions, ex. ACECs and zones
- Eliminate all wilderness study areas
- Limit wilderness
- Re-evaluate places where new land threatments can be done Inventory wilderness

#### Recreation

- Camping, fishing, hunting, rock climbing, photography, river running
- Non-designated camp areas trash is left
- Limited facilities with motorized creation
- Do not encourage the increase of recreation in the areas look at distinction between Moab & Monticello fragility and impact from recreation
- Promote recreation Monticello needs
- Increase & promote to Grand County
- Recreation needed for the local economy more permits
- Access to information
- Plan and monitor
- Consider use numbers before issuing commercial permits
- Growth will increase visitation to the area
- Limit number or commercial permits
- Public lands users need to pass a user test

### Timber

- Chain pinion and juniper improve range, game, & fire control
- Manage wood cutting issues Cedar Mesa
- Issue more commercial firewood permits to rid of dead trees

# Group 4.

# **Topics for Discussion:**

Open/access – trails

Multiple use of land

Nuclear power generation/storage

Economic development

Mineral/fuel access

ATV use

Grazing rights

Hunting

Access for all – handicapped

Rescue access

Local decisoins v fed/state non-local groups

Benefit of wildlife & grazing

Thinning out – creating better winter habitat

Local land ownership

Controlled burns

Boy-scouting

### ATV's

- ATVs have increase with out access and designated trails, they go wherever. If we have specific trails this will help
- Heavy regulations
- Large plate on reservation to catch those who are not abiding by laws
- Federal land should be distributed evenly between the states through land exchanges

### Controlled Burns

- Better timing /better advertising & communication
- Ability to do it open land us for controlled burn
- If you can't use it burn it especially burn in mesa should new cultural sites
- Would help control bug population & beetle kills
- Reseeding
- Open up sites for boy scouting more cooperation teaches boys and gives service –
- more coordination

### Economic Development

- Annual ATV Safari more very successful gas taxes, revenue, lots of money flowing through
- Nuclear power generation/storage Manco Mesa
- County all ready full of uranium,
- Limited people surrounding it isolated
- Tourism isn't the economic salvation of this county copper is the type of economic development
- Tourism is only seasonal

- BLM factilitate bringing materials to White Mesa Mill
- Solar/Wind power energy development leasing to private companies
- Tourism cooperation with county (example Moon House)
- Develop areas for overlook

# Grazing rights

- SUWA is filing lawsuits for ranchers to do EA after lease runs out this is an unfair step
- to get ranchers off their land
- More voice/equal weight for locals
- Local control
- Consider the cultural richness of this area people here know and love their land and should have control
- After drought let ranchers go back to permit limits (original)
- There is no need to make difficult that which is simple historically
- Keep red tape off of simple things
- Ranching/dismissing frivolous law-suits
- More active role in management of lands (burn, seed, like Cedar Mesa)
- Creating more range (for livestock) and wildlife
- Let locals/ranchers take a role in this
- Revenue from firewood gathering (especially beetle wood)
- BLM good to work with the exception of Cedar Mesa let ranchers clean out area
- Deer benefit as well as cattle
- BLM more involved in water projects
- Fire management can show new springs-- fires consume large amounts of water ( for
- example, SW Tooele Oquirre Mtns.
- More chaining in certain spots in San Juan County & reseeding a study implemented
- Better work with other and all agencies
- Coordination between Forest Service and BLM on permits
- Drill water wells for cattle

### Joint Stewardship/Joint Action

• Let people who use land/have rights work together with agencies to come up with lands to preserve and use land -- involve locals in decision-making process. Let locals be involved.

## Mineral /oil/uranium/copper

- Firewood use wood for power generation
- Homesteading
- We don't want less public land we want to be able to use it don't sell to private
- More local control /multiple use of land
- Recapture Lake potential for tourism ex-campground area, jogging trails, boat docks, etc.
- More cooperation between different groups (ex. BLM/Water, NPS)

- Any way to capture water benefit the communities
- More opportunity to develop water resources build reservoirs
- Drill every mountain dam every stream!
- Work for the care and capacity of the land

## Multiple use of land

• We need to be able to use the land for all needs: ATV, grazing, roads, recreation, minerals/oil/copper, develop on land, tourism energy development (including wind & solar), restoration, and hunting. No limits. We need to use our land.

# Open Access (Trails)

- Roads are central to economic system
- Central to safety rescue, hospital, etc.
- Access is local control, county owns them
- Cultural heritage (5 generations seeing the land)
- No closing of new roads
- Some roads were closed illegally
- Consider loops that connect roads
- Parking lots (unload) for road access (ATV trails & hiking)
- No closing of old roads
- Equal weight for local culture
- People want access to trust agreement
- What is statehood/what does it mean answer this provide justification

### Special use permits

- They should be highly regulated and laws highly enforced
- Not unlimited amount land type should dictated amount
- Meetings open to public so they can input on ACECS
- General guidelines on national level not local control no micro-management
- Put 20 year limit on ACEC's

# Salt Lake City, Utah Open House November 13, 2003

#### **Written Comments**

Planning process: While I respect the right of people in a country to participate in the RMP, I object to the counties having an additional voice in the RMP, for this means that those in the counties involved in the RMP have double impact—(which) is not fair, not representative but surely misrepresentative. Unless: the BLM grants each country from the entire U.S. the same courtesy. This is <u>public</u> land, not owned by special interest in the counties. If counties have special rights and privileges, how come SUWA, Bonneville Co. in Idaho, etc. does not also have special rights?

The BLM needs to put more emphasis in protection of the natural resources found on BLM lands. More emphasis needs to be placed on reducing human impact and preserving these lands as wild areas, for the intrinsic value of wilderness as well as for the enjoyment of future generations. The resource management plan should focus on protection of these lands and reducing mineral extraction and motorized vehicle use. A secondary emphasis of the plan should be on low impact recreational activities such hiking, backpacking, camping and mountain biking. These lands belong to us all, so any use fees should be eliminated due to their regressive, exclusionary nature. (Use fees for camping, etc. should be removed, definitely not expanded.) Energy development should be halted and reduced where possible. No further energy development should take place on these public lands.

Keep Jeeps, ATVs, cows etc. out of the water sources. Water is scarce in the desert and important for wildlife and hikers too. Even if a river is not flowing in the summer, the potholes, springs and seeps are important water sources.

ATV/OHV users seem to think that riparian areas are appropriate trails if the streams sometimes dry up. There should be a clear policy that NO off roading is allowed in generally wet canyons.

### Concerns pertaining to W.S.A.'s

- 1. Local field offices should retain management control over adjacent WSA's. Executive demands to expedite oil and gas development proposals should trump local expertise.
- 2. Settlement agreement between Utah Judge Dee Benson and Gale Norton should expeditiously move through appellate courts until a well documented decision is reached.

The Colorado River should be designated by WSR. Its depletion by warring states should cease. John Wesley Powell stated it best. This is a desert—development should be minimal and controlled. The abuse of this natural wonder has go ne on long enough and should be immediately halted.

Special Designations: Concern: all motorized use should be restricted in or near any and all riparian areas, including: the Colorado River, Indian Creek, Dark Canyon, the San Juan tributaries to Grand Gulch, Comb Wash, Arch Canyon, Mule Canyon, Oval Canyon and Table Valley—these should be provided Wild and Scenic status. Grazing should be banned in all

tributaries to the above streams, rivers or canyons. Science should take precedence, not Bush league politics. Stewardship is essential, not commodity use. National security demands the BLM preserve, not exploit.

Wilderness Study Areas: yes to all. Despite back door, unethical and poor science deals and demands by the Bush administration, the BLM should use its policy power to preserve WSAs already identified and those catalogued in Wilderness at the Edge, a SUWA publication. No roads, no oil and gas exploration in these areas. No OHV access, restricted grazing and protection of riparian, cultural and wild areas in proper stewardship. Do it, please.

Many more areas could easily be class 1. The Dolores River, Negro Bill—oh so many.

I've heard friends say that the natural experience at Dead Horse Point is very much reduced due to the obvious imposition of a mineral mine at the base of the view corridor. This is a tragic loss to one of the scenic areas that is easily accessible to people. So much more would be (and sometimes is) the tragedy of a continued push to allow the compromise of divinely created places in the name of short term profit. Most people I have had discussions with on these issues support at least 10-15% of our state being preserved in its naturally created state; a place of refuge from human intervention and a place free of the noise and congestion of the mechanized world. Wilderness, by far, is the best land designation available to BLM.

#### Fire Kathleen Clarke.

I am concerned that the enforcement of WSAs is extremely difficult with the amount of resources the BLM has. I think it is very important to protect this area and other areas that could be considered for wilderness status. Wild rivers are important for many reasons. I personally enjoy the quiet and solitude. Having been in Europe this summer, it is obvious that the United States has beautiful wild areas. Europe has basically affected every piece of land. I would like to see our wild lands unaffected by man. It is also extremely important for plants and wild life to have these areas. Please work to protect these wilderness areas.

Do not allow oil and gas drilling in the enlisted wilderness areas! This is all the wilderness there is and once it is gone, it is gone forever. Do not deplete the beauty and value of these priceless areas.

## Special designations:

- Protect through WSAs or areas of critical environmental concern ALL land that was previously part of the BLMs 5-million plus wilderness study areas.
- Enlarge WSA in Cedar Mesa region
- Protect Cedar Mesa from over hiking and over grazing
- Place White Canyon in WSA
- Enlarge WSA in Dark Canyon; stop drilling
- Add Hart's Draw to WSA
- Add Little Rockies to WSA

More trails are the answer.

My vision involves compromise: I am pro-wilderness yet want access on existing roads to slot canyons and climbing routes. I do not want grazing rights extended nor do I support gas and mineral extraction in the SE Utah zone in question.

I believe tourism is the future for southern Utah wilderness areas. All other forms of income do not last. Mining is the first one that comes to mind. It seems to me that we should look to the future through those who will love and appreciate the land.

Would love to continue to have access to public lands that we may in (?) and around to enjoy. Responsible use is always promoted on all outings.

Keep our public lands public. Leasing (selling) off land for oil/gas exploration is an abomination—who will benefit? Corporate greed wins again. Such activity destroy habitat, degrades the water and air and leaves a legacy of pollution/destruction for citizens now and out children's children. Be a model: the environmental movement used to be called conservation. Develop alternative energy resources and conserve now.

I am writing on behalf of the 4-wheel drive community. I am not going to use buzz words or sugarcoat my comments, so here is the how the 4-wheel drive community is an asset, how we can help and what the BLM should do.

- There needs to be more education with the 4-wheel drive community.
- There needs to be maps or something to that effect information of trail closures. This will prevent confusion regarding what's closed and this will minimize environmental impact.
- More enforcement is needed to catch those who do not abide but for this to be effective there needs to be more communication.
- We are also and asset and organized 4-wheel drive groups are more than happy to help clean up and protect the environment

My family visits Moab/Monticello BLM lands about 6-10 times per year. We like to car camp, backpack, mountain bike and have taken river trips on the Green, Dolores, Colorado and San Juan Rivers. I would like to have the BLM set aside more land to reserve natural values. I would like to see oil and gas development excluded form areas with wilderness quality or nearby recreation use. I would like to keep jeeps and cows out of water sources and riparian areas and springs. I would like limits on off-road vehicles to confine them to existing roads and keep them from making their own trails. I like the management along the Colorado River Corridor near Moab. It's a good balance for managing crowds and providing a good recreation experience. I would like to limits on off-road vehicles to confine them to existing roads and keep them from making their own trails. I like the management along the Colorado River Corridor near Moab. It's a good balance for managing crowds and providing a good recreational experience.

I love BLM lands. It is so nice to know that I, as an American citizen, have the right use this land. I also understand that in order to respect my fellow citizens, I MUST use this land in a way that does not harm, marre or upset the delicate balance of the land or detract from the enjoyment of others. That enjoyment should be conducive to the land. In other words, enjoy the solitude, peace and beauty of this place. This is what it is! It is not a playground that destroys, not only the fragile desert but also the serenity so yearned for by so many others. Access to the land using very limited roads is a necessity but for the overwhelming majority of the land, wilderness is the only designation that will

give the protect American's need. The Moab and Monticello areas are beautiful. This is increase the numbers of visitors to the areas and the protection will be very important. I personally do lots of hiking and also enjoy other forms of recreation. I would like to see everyone enjoy the areas but protection is vital if we want to keep them beautiful. I am concerned that recreation will overweigh the ideas of protection. I am also concerned the new energy policy will allow for many more leases especially in very sensitive and remote areas such as the Book Cliffs. Please review every claim carefully. Please keep these areas beautiful and remote.

The BLM should define a "road" as a purposely constructed thoroughfare that arrive at a specific destination or exists for a commercial purpose. Someone's "detour" x-country that leaves an impression but goes nowhere should not be a road. Motorized access to these non-roads should be prohibited.

Pay attention to and mitigate the effects of coal bed methane development on surface, water, ground water and soils (through evaporative ponds, i.e.) Also examine, account for and mitigate all the effect of resource development—i.e., roads, drilling techniques and the choice of drilling technologies on surface impact and aquifer impact, leaching, ponds, pipelines and other methods of bringing the resources to market (i.e. keep people and truck tours out of WSAs, WIAs, and cultural sensitive areas and not just the wells). Encourage development near existing infrastructures (i.e. Uintah Basin) rather than facilitate infrastructure necessary for resource extraction in remote areas (i.e. Southern Book Cliff).

Just which resource value—would not warrant conservation? We can't manufacture resources, once they are destroyed, they are gone forever, vulnerability—we are making America's children and children's children hostages to those will the increasingly vanishing oil/gas supplies. Be patriotic—conserve America's resources and develop alternative energy sources now.

There are many areas unsuitable for mineral entry and surface occupancy for oil and gas development. The Colorado and Green River corridors are important examples. But the Dolores River, Mill Creek, Lockhart Basin and Dome Plateau are important too. Existing wilderness inventory areas should be withdrawn from surface occupancy too.

We need mining and extraction but we also need long-term thinking that considers the values that are not so easy quantifiable in economic terms. This is amazing, unique land, full of spectacular areas with the opportunities for solitude, silence, connecting to the person within. That's crucial—we need that.

Serious considerations should be made before allowing more mineral leasing. Much of this area is pristine wilderness and the long-term effects on the wilderness are not worth to amount of energy we will get from these areas. Exploring for minerals, oil and gas can be just as harmful as actually drilling. New roads can completely destroy habitats. Please carefully consider whether it is worth energy exploration when it is non-renewable.

Simple solution: ban all motorized use off regularly maintained (2x/yr) roads and there will be a savings—enough to not lease any lands (public) in the RMP areas. All WSAs should be permanently withdrawn from mineral/oil/gas etc. exploration or development. This includes are previously identified WSA and those catalogued in the citizen's proposal for 9.1 million acres of BLM wilderness.

Wilderness must prevail. Events like the Jeep Safari must be discontinued. Gas and oil development must be limited.

All agency actions should continue to comply with NEPA requirements as well as through ESA review. The whims of the executive branch should be tempered by good science.

# Mining/Oil/Gas:

- Valley of the Gods is an open area that drillings a surface disturbance is obvious. The wells aren't producing so places don't allow any additional wells.
- The views atop Comb Ridge are widespread and breathtaking. Wells and other disturbances and intrusions are easily seen in the areas to the east and west. These wells especially to the west aren't producing anyway. Do away with what's in the ground areas and disallow future wells.
- Allows as much drilling as sensible in the Montezuma Creek area. This location is already disturbed and is producing
- I have hiked in the Hat's Draw and Lockhart Basin areas. These are incredibly beautiful and rugged. Please keep new oil & gas mineral leases out of these areas.
- Dry wells and other non producing wells are located in the Cedar Mesa region. This is an area of archeological concern and should not be disturbed by wells. Do not issue any additional wells in this region.

I would like to see the BLM start designating land with high wilderness characteristics as areas for non-motorized use. Such as lands with special designation for hiking/horseback use. These lands don't need a wilderness designation but something that would limit motorized use. In addition, the BLM needs to monitor use of areas such as OHV and wilderness in order to do better studies that determine their importance to the public.

Our public lands should only support activities that preserve the full value of the land forever. I understand that in order to support the needs of our society some extraction must occur. But this should only be done in fairness to every citizen that co-owns this land. They should go to great pains to restore completely that land. Furthermore, every single activity that goes on in the land should be completely open and public. Whenever possible, leases should be acquired by the BLM to end resource extraction. It is obvious that extractive industries only leaves us poorer in the long run. The value of this land is in its natural state. Trading school trust lands and other private ownerships should be pursued in order to enable the creation of large areas of wilderness. This is the highest value of our land.

- Remove cattle from all riparian areas and areas where crypto biotic crusts are the norm.
- Eliminate grazing in all high recreational use areas—a cow trashed landscape/stream is not what hikers want to experience.
- Inventory existing roads and trails
- No new roads except for purposes approved by general public through an open process
- No vibrating truck exploration for oil and gas (thumper trucks). Creates new roads
- Closing and reseeding has not been done effectively.
- Adhere to existing rangeland health standards. <u>Proper funding</u>—conditions not barely sustainable.

If oil and gas occurs, require best available technology:

- Silent pumps
- Screen pumping facilities from trails
- Do not allow in view sleds
- No lights to impact night skies
- Not in WSAs and areas previously inventoried wilderness areas
- Directional drilling to reduce road impacts
- Climate footprint and smallest needed for maintenance
- Close oil and gas roads if newly constructed

Could BLM and all other land management agencies get together and come up with a map of all areas in Utah (or elsewhere) that require special permits that we recreationalists don't plan a trip, get to the trail heads at 7 pm on Friday and say "oops, we need a permit." You could place this master map on each agencies Web page and distribute it where we go to get public lands info (i.e., visitors centers, REI, etc.) Minimizing surprises is the goal!

Protecting habitat—vegetation and wildlife—should be the highest priority for a BLM in this treasured region. Once destroyed, extinction is forever. None can be created in the factory. America's heritage is out land, what inhabit is and what lies beneath. No roads through sensitive areas—ban all ATVs—revoke and do not issue any leases for exploration.

From what I've read and seen firsthand, the leased use of BLM land for livestock grazing has been and is still being abused in many cases. The price at which the BLM leases out lands for grazing is around a sixth of what costs to maintain/restore it (that is <u>if</u> that restoration is carried out). I understand that BLM isn't the same as "designated wilderness" or even national forest land but should still be more responsible in the use it allows for commercial grazing. In short, I don't want <u>my</u> public land abused at an artificially subsidized price by ranching that damages indigenous plant populations, animal populations, causes erosion and decimates native biomass and biodiversity. I appreciate what the BLM does do. You can also do better.

We need to keep wilderness as wilderness. There are too many wilderness areas disappearing in the U.S. Please examine road less areas and keep them as wilderness study areas at least. More people enforcing closed roads would help. Also, keep habitats for endangered or at risk animals and plants whole. Splitting habitats with roads or mines etc. is extremely harmful. When we have droughts less grazing should occur in sensitive areas. Even during near-drought years, less grazing could help repair areas and allow the native vegetation to grow back.

Buy-out and permanent retirement of all grazing allotments in the RMP areas should be encouraged. The BLM lands in UT (desert!!) are no place for livestock grazing of any type. Grazing is a wet climate use, not a desert use. No big timber "fire management" scams!! "Thinning" as a thinly-hidden means of promoting timber harvest should not be allowed. If fire management is used-then areas should be treated and target small bush. Fires? Ok and yes! Do it! No chaining! No, not anywhere. No water developments for livestock. No more.

It is always so surprising to me that we consumers are not aware of the raw materials that supply our needs. I firmly believe that we would be far better off to <u>severely limit</u> the "harvesting" of vegetation on public lands in delicate areas such as the fragile forests of southern Utah. It is so rare to find areas in such harsh deserts that are supporting the growth of majestic forests.

Anytime a fresh cut logging road, or a freshly cut tree are found, it is an enormous <u>loss</u> to the quality of the landscape. The natural systems of southern Utah are so fragile and carefully balanced. An ecosystem upon which multitudes of creatures rely must cover vast areas and many climates to thrive. Please let the forests and vegetated areas go about their course and let us consumers find better ways to support our needs.

# Wildlife/vegetation/grazing

- Stop chaining projects.
- Keep livestock away from riparian areas.
- Reduce livestock allotments in areas that can't feasibly and naturally support it.
- Protect areas that have been damaged by overgrazing.
- Replant sagebrush and trees where they have been cut or chained in the past.
- Reduce non-native grasses.

Please look at the Sage Grouse that are in the Book Cliffs. They are rare, if not extinct and propriety dictates that you should consider their fate before they are proposed for listing.

Please consider protecting Ponderosa Pine in the limited drainages in which they now exist. Also you might look at habitat for rare and endangered species. Please protest all perennial drainages.

Arch Canyon should be a national monument. Well, that ain't gonna happen but how about protecting the canyon from OHVs a little more and working in concert with the Forest Service to address the upper and lower canyons and considering ACEC designation for key values.

OHV recreation is vital to the Moab economy and culture. Taking steps to assure the land is protected and managed properly for OHV use is extremely important and not be a BLM priority.

In addition to vegetation, rare plant and wild life surveys, an inventory of crypto biotic soils should be done in order in order to make informed decisions about areas open to cross-country vehicles—I would otherwise simplify the process by not permitting such travel at all, only on designated routes.

Areas of concern that should be closed to motorized use: Arch Canyon, John's Canyon (near Grand Gulch), Jacob's Chair & Piute Pass (near White Canyon), Falls Missile and Bridger Jack (near Canyonlands National Park), Moqui Canyon, Butler Wash, Hart's Draw, San Juan River Corridor, Recapture Wash, Cottonwood Wash, Davis Wash, Lavender Wash, Grand Gulch Recreation Area, Hey Joe Mine Area, Moab Rim and Mill Creek.

In terms of access and motorized travel in otherwise wild and inaccessible public lands, I believe strongly and seriously considering any area in question to being opened for motorized travel. I understand that local economics also depend somewhat on ATV and dirt bike usage. However, I am very concerned by the continuing trend of increased road access in our otherwise untouched public lands. Many of these areas are valuable largelybecause of their remote location and the relative difficulty of accessing them. Creating or allowing roads into these areas (paved or not) greatly compromises (permanently) the quality of our public lands through erosion, introduction of non-native plants, noise, air and soil pollution and other ways that I'm sure you're aware of. The re-designation of roadless areas in next to impossible once a road is cut by a few vehicles. There are plenty of very accessible areas to the elderly, disabled, overweight and time

constrained Americans to reach on motorized vehicles. We have reached a point at which we must exercise some restraint in making wilderness accessible to everyone, convenient for everyone, etc. The value of this remaining wilderness is found in experiencing it on its own terms. Many of the existing ATV dirt bike trails are in poor repair, expensive and difficult to manage. Instead of opening more land to motorized vehicles, we should restore and improve maintenance of the existing roads, if not close some of them off.

Those traveling these roads on ATVs and dirt bikes should be financially responsible for their maintenance and held accountable for their abuse. I venture to argue that it is partially in the BLM's civic responsibility to better educate Americans about motorized use of public lands and hopefully turn civic consciousness in the favor of roadless lands.

### OHV Multiple Abuse issues:

<u>National Security</u>: all OHV use should be immediately and permanently banned—not only because of dramatic and catastrophic resource degradation, but also because it promotes and represents a huge risk to national security; waste of fuel both in driving the blue smoke hoard, but also because large vehicles are required to transport OHVs, thus more pollution, more waste of precious resources essential to national security. Wave the flag and ban OHVs from all public lands.

Routes: the cumulative impact of all transportation (OHVs, hikers, horses, bikes, etc.) should be assessed. Use limits should be set where needed. OHVs and other motorized use should be totally restricted to regularly (2x/yr.) maintained roads in all resource areas. This will help protect resource quality and allow use by less destructive users, such as hikers. Areas to close all motorized use: Arch Canyon, the Moab Rim, Piute Pass, Cedar Mesa, Bridger Jack and Falls Missile, Jacob's Chair, Butler Wash, San Juan River Corridor, Lavender Wash Davis Wash, Moqui Canyon, Cottonwood Wash, Hey Joe Mine, Mill Creek, White Wash, Sand Dunes, Recapture Wash, Cedar Mesa is not an appropriate place for "Jeep Safari" type of motorized events. There is too much danger of damage to the archaeological sites and to the untrammeled quality of the land. One friend who knows the area well was literally in tears when she learned that a jeep rally would be held on Cedar Mesa. Access should not be allowed to become destruction.

It is sad to see wild and scenic areas disturbed by human use. I wish all land was open in its natural state but realistically this utopia is not possible unless all humans are gone.

Please stop managing for tourism; it will only bring more people and more negative impacts. Don't allow the mining and oil and gas exploration and grazing. People who live in the city like me should realize that living in huge home, driving huge cars and eating huge hamburger/steaks has a cost.

It seems to me from viewing your map for areas designated for motorized vehicles, there are far too many areas for motorized vehicles. Barely 10% is off limits. This is not acceptable to me. I'm sure that more areas for wilderness can and should be identified. ATVs clearly scar the land. Some areas, but at a smaller scale, should be set aside for ATV, but not as much as is currently proposed. Certainly all riparian areas should be off limits as well as sandstone areas.

If the government can't protect the vulnerable, who can? What is vulnerable? The land, resources, water and air. Ban all ATVs on public land. I visited Cedar Mesa—seeing 2,000 year

old rock art—what price do we put on that? It cannot be recreated; once destroyed, it is gone. Sensitive, vulnerable areas should be difficult to get to—no roads—wilderness permits should continue to be required and not easy to obtain. Oil and gas exploration should be allowed on or near wilderness; resulting pollution degradation of land/cultural resources are not mitigable.

What should be closed to ORVs: Special attention needs to be given to the damage done to riparian areas—Arch Canyon is a famous example. I'm worried about the treatment of creeks like the 10-mile Wash, especially vulnerable. You can't protect the land and the values of solitude and have ORVs tearing the place up.

What is the point of an SRMA if it does not protect the most valuable resources of that area?

What is more valuable than the natural state and balanced design of untouched wilderness? The thrill of off-roading is not only permanently destructive to the quality of the land but also thoroughly destructive to the quality of the experience of any person desiring to experience the place in it natural state. Quiet. Alive. Beautiful. Perfect! I am so thoroughly disturbed by the lack of protection of these last remaining untracked lands of our state. If OHV use continues at current rates, there will no peace found in the wild lands of Utah. Wilderness protection is the only suitable and comprehensive protection for the majority of these special places. We need millions of acres of wilderness.

More work should be done on the existing route inventory. Using USGS maps from the 1950's don't show reality. Use of air photos and field work could help greatly. Please allocate more resources to this. OHV use should be restricted to existing routes routes and should not be allowed in sensitive areas such as riparian zones and pristine areas. All recreation should be allowed in these areas but no recreation should be allowed if it will greatly damage the area. Huge groups should be limited even if people claim it will hurt their business or the economy. You can still allow these activities without allowing the 100's or 1,000's of people.

Close motorized vehicles in riparian areas, sensitive biological areas, and sensitive geological land form area. Lets ATV have other non-sensitive areas to use.

Prohibit and enforce motorized or bicycle access to areas where their use would endanger wildlife or mature vegetation. This includes all riparian areas. Riparian areas, wildlife and native vegetation are fragile assets in these harsh, arid environments. The greater the visitation to an area, the more responsibility the BLM should exercise in limiting the allowable modes of assess to the lowest level of impact necessary to protect vegetation and wildlife. The many twisting canyons in SE Utah attract the tourists who provide the greatest part of the economic base to this area and their economic influence continues to increase. Most of these visitors don't bring off road vehicles and are drawn to the beauty of the place and don't want the disturbance of motorized vehicles or the scars left by them.

Limits ORVs and all other vehicles to obvious roads. Too much of the land is open to unrestrained off road driving. Increase enforcement of driving off road in areas where it is not allowed. If desecration of land doesn't stop, close the roads. Do not allow vehicles in Mule and Arch Canyons. Stop off road vehicles use in Cark Canyon areas.

Limit to existing and maintained dirt roads.

Off Road Vehicle Groups: We need to work with each other. This is the only to even begin to try to police or enforce improper use of the land. There are many off road clubs that are very aware of what needs to happen and they do their part to protect the land. I feel that your "club run" restrictions are pushing these legitimate organizations away. I propose more contact and communication with club officials. I can speak for my club; we are more than willing to assist where we can on the trails. Is this means being agent for the BLM or merely documenting violators, we would love to assist. Maybe a club program can be put into effect so that the BLM would then recognize those outstanding clubs (much like the Better Business Bureau does.)

# **Small Group Discussions**

(Five Groups)

### Group 1.

# **Topics Listed for Discussion**

Recreational OHV

General process

Recreational in all forms

Wilderness – preservation

Cultural – recreational

Wildlife vs. grazing

Protection of water quality

Oil and gas development – leasing

Road density

Access

Habitat protection

Grazing vs. mining

Urban vs. rural

Research

#### Cultural Resources

- Vandalism
- Law enforcement to help protect if no money is available, close area
- Cultural with high density close
- General Education so that people know the value

Utilizing school systems

Informational kiosks

BLM sponsor courses

Cooperative programs between all user groups

Adopt a site program

Education can be a "double edged sword"

## Funding:

- Use reward system for those that report those that disregard the land
- ROS Spectrum use more implementation for all types of recreation/uses
- Controlled, extensive, comprehensive, collaboration

(Arch Canyon –more open land --- others would like to see Arch closed)

• Numbers of people using the roads

Limits vs. high use (impact a small space – disperse)

Accessing

Use scientific symptoms (soil, vegetation, etc.)

Condensing the already heavy usage of ATV

### Oil and Gas:

- Keep WSA's as WSA's
- Keep WIA's intact
- Using science to determine
- Cherry stemming should not be used for oil and gas
- View sheds should not be impacted
- Minimize pollution, and sound, noise
- Require best available technology
- Close oil and gas roads after development
- Limit number of wells
- Don't close existing access where oil and gas is developed
- Increase royalties for oil and gas permits

### Recreational OHV:

- Keeping trails open
- Routes stay open and other roads closed
- Select routes; use scientific process to designate routes/road closure
- Signing of routes
- Use OHV and other groups to help volunteer and educate users

#### Wilderness:

- More funding for WSA management
- Comprehensive analysis/planning
- Permit use on cherry stem roads (to monitor)
  - Large fines for violations
- Put visible numbers on ATV's so they can be reported
- Upon purchase/registration of ATV, provide a packet of information
- More controls on ATV's, limit numbers of people by using permits for wilderness areas
- Eliminating jeep safaris
- Require permits for hikers to reduce search and rescue costs unless a critical need
- Group size limits in wilderness areas.

# Wildlife/Grazing:

- Fencing riparian areas and providing stock ponds for use by both wildlife and cattle
- Eliminate grazing on lowlands and riparian areas
- Only eliminate grazing in critical or highly sensitive areas.

# Group 2.

### **Topics Listed for Discussion**

Wilderness

OHV (off-highway vehicles)

Cultural Resources

Enforcement

Grazing

Oil and gas

Travel

Management policies

Recreational

Interim management between policy decisions

Education

Wildlife

### Cultural Resources:

- Controlled/limited/monitored access to provide protection
- Thompson and Sego Canyons should be protected to be a heritage site
- Consider mine sites (anything 100 years old) historical (protect accordingly)
- Inventory of cultural resource sites

#### Education

- Education program offered by BLM
- Responsible land use
- Kiosk set-up in parking/staging areas
- Cultural resources
- Access maps for visitors
- Increased cultural resources protection enforcement
- Agreement policy for access violations
- Enforced penalties for access violations
- Across-the-board leave no trace (or whatever the access/use policies indicate)
- Educate user groups, associations, etc.
- Education packet (consisting of use policies) for specific uses and events (e.g. jeep safaris)
- Balance regulations and freedom to use

### **Enforcement:**

- BLM developed program identifying steps to report and eventually restrict individual users based on access violations
- Presence of access watch program (high schoolers, retired persons)
- Better partnerships between enforcement agencies/groups

# Grazing:

- Do not let grazing limitations prevent rancher livelihoods. Protect existing permits if changed make elsewhere
- Opposite point of view go ahead with limitations despite socio-economic effects
- Allow for improvements benefits wildlife and domestic livestock
- Charge full market value
- 40 to 60 percent of range is for wildlife
- Understand carrying capacity of land (for livestock and wildlife)
- Increase monitoring of allotments (enforce allowed use)
- Establish range management policies (e.g. riparian access)

# Interim management between policy decisions:

- Continue enforcement while changes in policy are being considered
- Enforce access regulations as per use signs (e.g. Arch Canyon)
- Discourage stalling/delay of wilderness designations
- Public input by users (e.g. wildlife representatives)
- Open/public process to identify wilderness

### OHV:

- Complete list of current recreational (non-hiking) trails including status (access regulations and reasons)
- Riparian areas closed to OHV use
- Trails closed for riparian reasons should be re-opened after 10 years as per existing management regulations.
- Mitigate for any necessary crossings of riparian areas
- Increased signage to prevent getting lost and receiving subsequent punishment (use Red Rock example)
- Provide for remote camping opportunities (w/no new road development)
- All closed trails should be re-opened.

### Oil and Gas:

- Citizens proposal for wilderness would not allow for oil/gas/mineral development
- Same as above except that oil/gas/mineral development should be allowed.
- Energy development should never inhibit cultural resource protection
- Utilize existing development areas prior to exploration
- Prevent development/exploration in areas of critical environmental concern and wild and scenic rivers
- Identify/understand future development plans
- Reclaim previously developed areas (when resources have been exhausted)
- Utilizing existing corridors for future development of oil or gas pipelines/roads.
- Designate travel routes for access to oil and gas development sites (so workers are not using OHV trails)
- No surface occupation permitted in the citizen's wilderness proposal (on existing leases)

#### Recreation:

- Consider socio-economic implications (e.g. locals say over management decisions that affect their lifestyles/livelihoods)
- Wildlife (inhabitants of land) ecological interest advocated for
- Equal division of recreational use areas (e.g. river access)
- Do not weight local in-put heavier
- Identify recreational use conflicts
- Reach out to user groups/organizations for management of specific problems
- Balance recreational uses (there is room for everyone)
- Encourage tolerance of user groups when access is permitted
- Manage conflicts of river use and motorized vehicle use Labyrinth Canyon
- Develop regulations/clarification regarding user conflicts (e.g. hikers on jeep trails but jeeps not allowed on hiking trails)
- Identify new motorized vehicle trails with increased levels of difficulty

#### Travel:

- Identify and mitigate issues
- Identify resource-wide travel uses and consider cumulative effects and user conflicts within special designations
- Input from search and rescue/enforcement officials when developing management plans

#### Wilderness:

- Settle legal issues regarding wilderness
- Conduct inventory of wilderness areas (define wilderness)
- Stop new road development (define road)
- Identify access (who, where)
- Define "path," "deer trail," etc.
- All roads and WSA's should be opened.
- All wilderness designated after 1991 should be disregarded
- Only BLM inventory prior to 1991 should rule
- Don't manage WSA as wilderness until designated
- Consider and accept citizens' wilderness proposal
- Consider all input regarding roads from citizens groups

# Group 3.

### **Issues Listed for Discussion**

Wild and scenic rivers

Encourage club use

Wilderness qualities

Oil & gas/mineral development

Riparian protection

Clear definitions of key words

Off road vehicles use

Sensitive soils

Grazing – cattle, administration/planning

Trails – increase

Enforcement of protected areas

Economic studies

Travel plan and state funding

Plan for growth/increased use

## Citizen Wilderness proposals:

- Protect until further decisions, preserve what is left
- Land use decisions by locals, not Washington, D.C.
- Respect opinions from visitors/tourists from all over they support local economy

### Club Use:

- Don't charge for club use
- Clubs provide education, community service projects
- BLM should coordinate with clubs
- Improve permitting process
- Volunteer/adopt a trail programs
- Address problems of users who disregard permits
- Give clubs/responsible users some authority to enforce
- See clubs as positive
- Reward system respond
- Allow WSA's and trails to co-exist
- Make wilderness boundaries something manageable and user-friendly

## **Cultural Sites:**

- Protect those clearly marked
- Education tell public why valuable

#### Mountain Bikes:

Mountain bike patrol would help enforce responsible trail use

### OHV:

- Education to keep use on trails
- Designated routes use user groups to help enforcement
- Maps and accessibility trail heads
- Clearly mark
- Through enforcement actions, prevent creation of new trails, protect wilderness
- Designate "areas" of use, trails always change soils shift
- ID areas which contain shifting soils and areas with trails that don't change provide different management for each
- No motorized use in WSA's
- Improve planning/public comment process to designate trails
- Improve inventory
- Use user-groups to help identify
- Use good science for decision making
- Improve signing
- Evaluation process or criteria to decide where trails (new) could be designated
- Use examples from other lands to evaluate impacts e.g. user passes, permits, where
- Funding goes back to resource protection
- Club programs
- Impact fees
- OHV registration fees linked to users doing service projects as credit
- Improve process of making/planning maps to improve quality and current designations.
- Use logic and reason

# Personnel needs/funding needs:

• Increase to help enforcement

#### Sensitive soils:

- Important components of desert ecosystem
- Recognize the need for protection from OHV's

### Trails:

- Trails
- Funding from State
- OHV trails

#### Wild and Scenic Rivers:

- Make designations
- Mineral development along rivers and popular recreation areas needs
- Clearly define definitions of rivers, creeks, e.g., Ten Mile Wash –trail use in washes
- Nominate Dark Canyon and Westwater for protection nominate regardless of amount of flows

### Wildlife:

- Think at larger scale landscape-scale corridors for protection
- Hire good biologists, use good data

## Group 4

### **Issues listed for discussion**

Recreation/SRPs
Trail Designations

Roads/Lists

**Endangered Species** 

Antiquities

Grazing (permits)

**Energy Development** 

Watershed Protection

### Antiquities:

- Inventory of antiquity sites monitored more closely
- Need to be protected, preserved
- Enforcement, manpower (needed)
- Education/literature on consequences, ability to report on disturbances

# **Endangered Species:**

- Resources allocated to survey
- Use habitat wildlife issues to base decisions on
- Education for visitors about species in areas
- Provide info about sensitive areas on the Web site, at Virginia Park
- Info made more public
- Communication between agencies for better eco system management

### Energy Development:

• This RMP should not ignore the total environmental impact:

Roads, evaporative ponds, ejection wells, ground water contamination, surface salinity, aquifer contamination, habitat, tailings

- Require a bond for reclamation from company
- BLM should require fair market value for lands that are leased for extracted resources
- Restrict energy development in WSAs, WIAs, and southern Book Cliffs.
- Look at renewable energy, wind, solar
- Keep windfarms out of WSAs
- Full NEPA process for energy development
- Look at total impact at more than one permit, ex.: grazing, energy, recreation
- Impacts by area
- Impacts index to help assess impacts in area
- Look at economics of area before issuing: transport to market, remoteness of location
- Withhold if not economically viable
- Treat all lands as special; designate specific areas for extraction
- Encourage alternative extraction to reduce impact, ex.: directional drilling

# Grazing:

- Charge fair market value, stop subsidizing
- Keep existing permits
- Keep cows out of riparian areas
- Organizations that never intend to graze the land should be allowed to bid and retire the land.
- Evaluate grazing based on science rather than history.
- Monitor resources: ensure renewability of grazing lands by grazing
- Limit grazing in times of drought
- Resources and manpower (needed) for existing grazing laws
- Voluntary buy back should be allowed to retire allotments
- Study on impacts and benefits of grazing
- Public should have rights to permits on public land
- Limited grazing in desert areas (this area)
- No more big company agendas

#### Recreation:

- SRPs to help protect resource rather than revenue
- Easier to use public land for recreation
- Separation of different types of recreation; motor/non motor; non vs. non noise
- Rivers, streams, geologic land forms should be non-motorized
- Keep existing non-motorized, no new
- Like the process the way it is now
- Designation shift to impact rather than motorized, non-motorized
- Define road: should be construction thoroughfare
- Constant evaluation by BLM for appropriate use
- If it is not a road, it should be closed (to motorized)
- Problems is enforcement, needs more enforcement
- Designate areas closed to motorized unless designated open signs
- Highly sensitive areas should closed to motorized-river, geological land forms
- More resources allocated to recreation: staffing, planners, discussions, monitoring
- Respect for RS2477
- Balance resources; not all closed or open, expect June's Bottom
- Access historical applications of roads
- Hell's Revenge: not sure what's closed. Logs? Signs? More education is needed
- Better informed, reduce impacts
- Recognize groups better (Riverrunners, OHV User Groups)—SRP process easier for groups, most likely more informed
- User groups can be an asset and should be treated as so
- More energy on individuals vs, group
- More people in the field
- More responsive

## Recreation SRPs:

- More manpower to better educate and enforce
- Tally and publish the results of the SRPs in the New York Times

### Watershed:

- Enforcement of laws already in place
- Keep cows, cars and motorized vehicles out of riparian areas and cars
- Protect more than just surface water, include aquifers
- Consider drilling techniques of aquifers
- Consider conservation of water resources before development projects ex:, dams
- Consider impacts of surface activities on sub-surface water quality

## Group 5

#### **Issues listed for discussion**

Cultural resources

Rivers

Recreation—OHVs and non-motorized

Mineral extraction

Oil and gas development

Wilderness

Camping/hiking

Wildlife

Roads, RS2477

Sustainable lands

Permitting

Air Quality

Water quality

Visual resources

## Air Quality:

- Consider impacts of recreation, industrial activity on water quality
- Protect water quality with wild and scenic designation
- Consider Arch Canyon as Wild and Scenic

## Cultural Resources:

- Inventoried and documented: general location area
- Education programs for public about preservation
- Better law enforcement, using federal laws to govern
- Improve BLM's understanding; write new overview of resources
- Include Native Americans in evaluating cultural sensitivities
- Do a better job of following federal guidelines

#### Mineral Extraction for Oil & gas:

- Protect areas with valuable cultural and recreational resources and open other areas for mineral extraction
- Buy back leases in sensitive areas
- Consider areas that shouldn't be opened to extraction, supported by adequate
- Information about all resources, specifically cultural resources, wilderness area,
- Threatened and endangered species. Do not base on what a company wants but
- The value of the land beyond economic.
- Economic analysis as apart of the leasing decision
- Inventory lands that are not available to mineral extraction, oil and gas
- Stream-lined permitting process for leases; process takes too long now

#### Recreation

- OHVs Specific
- More education on available trails and what will be encountered. Work with OHV groups.
- OHV conflicts with cultural resource sites ex.: Arch Canyon, Texas Flat, Butler Wash, Falls Missiles area, etc.
- Better signage, marked trails for all vehicles. Clearly marked route endings.
- Complete comprehensive travel plan for RMP process now, for all vehicles.
- Maps available to users specifying type of vehicle use, readable maps; maps needs to stress the importance of guidelines
- Falls Missiles area: non-established trails need barriers
- Enforcement of laws
- Consider temporary closure for restoration with pubic input
- No new routes in areas inventoried as wilderness
- No trail in riparian areas, specifically Arch Canyon
- Against permitting OHV events on public lands
- Educate recreation land users about protection of the land and resources. Improve
- Education programs. Take programs to the public.
- Print the guidelines on maps
- Incorporate designation of trails for all users in travel plan, mixed use and single use trails.
- Target highly used trails for designation. Try even/odd day usage
- Why are trails restricted?
- Consider areas where users (non-motorized) trails are not mandatory
- Crypto biotic preservation, stay on trails
- Protect the ecosystem
- Consider opening single-use trails to multiple use trails. (bike & horse)

#### Rivers:

- Avoid development along river corridor
- Accurate and current eligibility study for Wild and Scenic along entire drainage systems
- Endangered aquatic life inventoried and reduce impact, not just wild and scenic
- Current permitting system for West Water Canyon is well managed
- Permitting—expand in the future. Impacts need to be studied

### Wilderness:

- More public input before designation of wilderness areas
- Wilderness designation signage with education information
- Previously inventoried and found with wilderness characteristics should be designated no surface occupancy
- Wilderness characteristics should be taken into management plans for consideration regardless of wilderness study areas
- Indian Creek are: improve human waster disposal
- Bridger Jack Road: avoid developed campsites
- No developed campsites in wilderness areas
- Go through NEPA process before renouncing roads

### **Comment Cruiser Comments**

## Negro Bill Trailhead

### 11 October 2003

Porcupine trailhead needs more trail markers.

Please block all travel in right hand lane of Mill Creek from the meeting of the left hand and the right hand near Powerhouse Dam up to Hidden Valley. Previously, shrubbery blocked access. Problem is too many people ruin top quality environment since 1972.

Local partners, local business, bike shops, clothing stores could make donations towards maintenance of facilities.

Please block horse trail, commercial groups from Mill Creek area.

I was very disappointed in the way that the BLM completely altered the old camping area at Sand Island. The beautiful old camping area was completely altered and new sites created that flooded. Sand Island was my favorite place to camp for over 30 years. Not now. I just feel sad and mad.

Wonderful stay! Campground was quiet but the noise carries—visiting from CA; felt relaxed but all the noise from the road was bothersome. Restrooms were clean.

Mill Creek Canyon needs attention. Cleaning needs, toilet and dumpster facilities—keep area free but provide maintenance.

Please put toilet paper in door on outhouse across form Negro Bill trailhead.

Negro Bill Trailhead improvement is outstanding. Looks natural but decreases damage along the route. I've been coming here since 1972.

No drilling in Southern Utah—keep it in Iraq and Caspian Sea like you want Dick and Bush; not worth it.

Make sure funding is provided for ongoing maintenance.

Noise ordinance in canyons. No motor vehicles and barking dogs allowed. We want solace. Electric vehicles and muzzles on dogs ASAP.

## Slickrock Trail Parking Lot

#### 11 October 2003

Want access to Klondike. No barbwire fence.

More tent camping (areas).

No drilling, no buildings, need bathrooms, more campgrounds and more recreation areas

Keep it (lands) open to mountain bikers and motorbikes. We are mountain bikers and appreciate the motorcyclists who discovered it. Everyone that we met on the trail was respectful to us and as far as we could see, the environment too.

Please stop the cute little rocks that border walkways and trails. Please keep it open. No barbwire.

Spend money educating people, not building structures that turn it into Disneyland. Leave it like it was—Moab has been ruined.

Trails out at La Salle are trails that exist and need to be approved—a process established that doesn't take so long.

Once feds are involved in regulations, they become overbearing on volunteers.

Leave it (the lands) alone. Fifteen years ago it was paradise and how you have ugly toilets and fences everywhere. Get your college kids a real job and leave this piece of heaven alone—government must go.

BLM land belongs to all of us, therefore I expect everyone to respect it enough so that I can enjoy it.

Get rid of motorized vehicles on specific trails or sites.

My first visit to Moab—it is beautiful and the people are courteous and respectful.

Motorized vehicles in scenic areas disturb my enjoyment of the area. Separate motorized from non-motorized areas; what about alternating days on trails for motorized and non-motorized or in different areas with similar experiences.

Consistent rules on all federal/state lands with effective enforcement; officers shouldn't interpret rules in the field. Even states have to be consistent otherwise travelers from other states don't understand.

I love the established campsites; keep people camping in established sites; that preserves the wilderness.

What about wildlife? All the planning is based on use of the so-called "resource". We've seen a big decrease in overall wildlife numbers as the visitor use has increased. As we continue to loose vegetation, all the small mammals leave the area and there are fewer "other" places to go.

The BLM is too lenient on rules; should follow the National Park Service guidelines.

No motorized vehicles except on paved or well-established dirt roads. Designated areas for mountain bikers. Mountain bikers erode the soil. Keep them on the slick rock.

Bike paths next to the main roads (around Moab).

# **Big Bend Campground**

### 11 October 2003

Cattle grazing should be increased—the was the way of the west and I am sad to see cattle ranching decreasing as more and more permits decrease.

More information on low-cost camping such as BLM campground. More education and marketing so young families know they (the campgrounds) are here.

Keep cattle off the desert. Deserts are lousy rangeland. Cattle increase erosion.

Commercialization of the area that results from increased tourists to an area; zoning issues—need to keep the integrity of the surrounding community intact. Need partnerships to work together.

### **Moab Information Center**

### 13 October 2003

I always stay in the backcountry. What are the rules? How do I get a permit? I come for the quiet.

Been coming here since 1982—I am a photographer. Changes over the years have allowed me more and easier access to areas to photograph. I am satisfied.

International Mountain Bike Association (IMBA) needs to be involved.

Our experience has been great so far (California visitor).

ATV going off trail on the LaSal loop road need control—too easy to roam. Make designated trails for them. We are jeepers and have ecological concerns; safety concerns: drivers need to be licensed.

Trail maintenance for mountain biking—Indian Creek up to Abajo Mountains—Monticello.

Need to encourage more volunteers for trail maintenance (Colorado visitor).

Please continue to maintain land for rock collecting. We had a great time collecting this year (California visitor)

Sand Flats: enforcement of quiet time from 9 pm -6 am.; dump station for trailers or RV; we have to leave area to dump and are concerned that other may not take the time to leave to dump and just dump there. (New York visitor)

Ten-mile wash remains open to OHV. Ride twice a year—great site for dirt biking. (Colo. Visitor).

BLM...stand up to SUWA. Don't let the S.O.B.s sue everything closed. (Colo.& Calif. Visitor)

Some people explore through microscopes and telescopes. Some people explore with computers and electronics. Some people explore on foot, ski, bicycle and other human motive means. Some of us explore in motorized contraptions. We all need to explore; it's the human nature. Don't close any roads and trails, please. (From a victim of Lyme disease)

Please let us use our land.

Education about potential impacts, i.e., when soil is wet, damage is high from mountain bikers and ATVS. Poison Spider: off trail use by ATVs.

BLM is public and people friendly.

Work with ranchers.

BLM is not as restrictive as other agencies and that is good.

We believe in use but not abuse. Public education (is needed) to respect the land.

Natural bridges national monument, Highway 96, more RV facilities; had to pull off road.

BLM is doing a good job but would like to see less ATV's especially (in) wilderness areas.

Specific locations for specific uses, for example, Kane Creek wanted a mountain bike experience, however, ATV & 4-wheeler. (Colorado visitor)

The desire to explore is for everyone—motorcycles, ATV, 4-wheeler, hikers, bikers, and climbers; respect everyone on or off trail. Don't close anything—teach everyone.

## **Dugout Ranch**

## Highway 211

Clear delineation of public/private land, i.e.: Dugout Ranch; Bridger, Jack Butte, Spires, Paragon Row & Trick's Wall. Climber/rancher conflicts; not clear who manages, where property boundaries end. Only two enforcers for entire district—too few.

Prevent sprawl of campsites at Bridger Jack and Fin Walls.

Resolve human waste at Bridge Jack, Supercrack and Battle of the Budge; Install pit toilet a Beef Basin Campsites.

Preserve the parks. No more new roads, No more ATVs, TVs, Hummers. Folks can either walk, hike or bike into the parks. Cuts down traffic, pollution and motorized destruction. (Jospeh Robertson)

Keep up the great work. Need speed bumps on Kane Creek Road. (Colorado)

If this is my land—preserve it. That means:

No driving on it; no damning it; no logging or mining on it. Humans have legs and arms; we can walk, we can hike. We do not need a hummer or helicopter to see the landscape.

If this is the future, preserve it. No more exploitation or resources—that means no more 80% of water to agriculture that doesn't belong in the desert. My idea? Read Desert Solitaire by Edward Abbey.

Great job—I love all the trails. (Colorado)

More toilet facilities—at night you can smell the waste (section B slick rock, south end; there are one at the north end.

Why walk or hike when you can enjoy Utah from the comfort of a hummer. Endangered species, fragile crytobiotic soil, ancient Anasazi ruins—see it all without even getting out of your seat. Hey, is this a free country or what?

No helicopters touring; no hummers; restrict motorized vehicle use.

Grazing & ATVs have a huge negative impact on the land. Increase protected areas with no grazing and ATV access.

Scorpion Gulch—grazing on top of riparian affects the area; not fencing in the area; Ham's Wash, more protection; Cedar Mesa: not protecting archeological areas.

Examine Grazing rights—are they rights or privilege? Public pays to hike on Cedar Mesa \$5 per person but cost to graze cattle is much less. Everything is a privilege.

Everybody wants something different but we all need fresh air, clean, sparkling water, healthy forests and oceans in order to live.

The environment is going to collapse just like the recent power failure—we'll be out of luck.

The biggest misconception of humans is that we must balance the environment against human needs—the reasoning is exactly upside down.

There is no more quiet. From my apt. in Moab I have to walk at least two miles down Flat Pass (from the golf course) to find natural sounds—water flowing over rock, gentle breeze, birds—the sound of a wing flapping—everybody should be able to experience this everywhere. Please BLM: focus on removing man-made items. Let nature shine through.

We need to reconnect with the earth.

Every decision should take into account the impact on the air, water, and environment because every part of the earth is sacred.

A human being is a part of the whole, call by us the "universe", a part limited in time and space. He experiences himself, his thoughts and feelings, as something from the rest—a kind of optical delusion of his consciousness. This delusion is a kind of person for us, restricting us to our personal desires and the affections for a few persons nearest to us. Our task must be to free ourselves from this prison by widening our circle of compassion to embrace all living creatures and the whole of nature in its beauty. Nobody is able to achieve this completely but the striving for such achievement is in itself a part of the liberation and foundation for inner security—

#### Albert Einstein

We need non-mechanized areas.

A mix of motorized and on-motorized areas in slick rock where uses cross is difficult—separate them. Education that it is a multiple use area. Commercial operators should keep jeeps on trails.

Make more roads but don't develop anything.

I love having had the opportunity to express myself. Thanks BLM.

Kane Creek Road past the last campsite is a "free for all" for campers. Need more camp facilities; consider charging fees. Also, in the open valley, people camping everywhere. More designation (campsites) news roads are cropping up.

Monitor Merimacks, Courthouse Pasture, Cotton Mine Road area, area up to Bartlett Wash, needs paid designated camping. Mill Canyon Blue Hills Road is "free for all" needs designated sites.

Where can you recycle in Moab?

Keep rock hounding and collecting open, i.e., agate, wood.

Pack out trash, more pick up and clean up; consider placing containers near the road for trash.

### **Moab Information Center**

## **16 October 2003**

Save the beauty of nature for all ages.

I don't want the land raped, pillaged and burned. Please save us from all of the gas exploration and mining.

The comment cruiser is a good idea—keep it up!

- Restrict ATV use—establish minimum age of 21, licensed drivers only.
- Manage land for animals indigenous to the region, not just human intrusion or economics.
- Recognize the economic value of solitude and its effectiveness on our leisure time.

Involve livestock folks (in planning process). We have to work hand in hand; if grazing occurs, they must be involved. Communication needs to be shared, people to people.

Provide non-motorized areas for hikers, hunters, and fishermen; for those who want to walk.

Prefer restricting motorized use limited motor vehicle use. Opposed to use of public lands for commercial purposes. If there is a profit off use of public land, it should not be allowed.

Separate motorized and non-motorized.

Please keep public lands public.

BLM should fulfill its role by:

- Refraining from privatizing any of these BLM lands
- Remove drilling in new areas such as in BLM land leading to Island in the Sky
- Limit ATV/motorized vehicle use to caretakers only

Need to build awareness with trail riding people...mountain biking, ATVs, motorcycles...regarding appropriate land use. May require a (education) course for this group. Please don't take away any more land use.

Require an educational "land use" course when registering off-road vehicles.

Managing use is important. So many more motorized vehicles. We seek out quiet areas also. Provide designated areas where there are no improvements or motorized vehicles. Highway 128 has the appearance of a lot of use and damage. This is a very delicate habitat—riparian area. Implement more Leave No Trace rules. More education; stay on designated roads.

- No fee areas
- More wild horses
- Enforce picking up dog feces
- No more developed camp sites and fee areas
- Keep motorized on designated roads and trails
- Make people aware of the fragility of the land
- Educate the people
- More money to the BLM for education and enforcement, not through the sale of lumber or with mining.

## **Monticello Visitor Center**

### 21 October 2003

Continue wild horses program—providing homes instead of killing them is a good thing. I raised three colts—it was an economic benefit for me.

I would turn everything into wilderness; there's not enough left.

We need multiple uses, for example, recreation (ATV), grazing, some wilderness, and hiking. Take care of the lands and don't abuse them.

Roads are ok, especially if you can drive on them to see the beauty. I love to see a "beautiful road"; what's wrong with man-made things?

### Clarks Market, Blanding Utah

### 21 October 2003

Give the lands back to Native Americans.

San Juan River permits are too difficult to for non-commercial users. Fourteen people (private users) that I know of applied for permits to run the San Juan and not 1 person got a permit yet there seems to be plenty for commercial outfitters.

If area is treated as private property with restriction, the government should be taxed. Restriction/regulation=laws. Should be approved by legislator-approved voters. "I want to walk where I wish—unregulated."

## **REI Salt Lake City**

## **24 October 2003**

Contact your representatives and inquire about the voluntary buyout for ranchers. Might cut back grazing and allow ranchers a way to save their businesses.

Don't let the fact that there (on BLM land) are some cultural sites there by the end of culture there. New cultural sites are part of the whole too. (Cited old and oil equipment as interesting cultural artifacts and as much a part of the past as ancient archeological sites)

This is a huge chunk of land and there is enough room for all of these uses.

Cedar Mesa Area: permits and user fees are great; easy road access not great. Roads aren't always necessary; increased traffic to the area is not a good idea. No wheeled vehicles (bikes included as wheeled vehicle) should be allowed in the area. I am not referring to the main dirt roads (Bushy Flats, Snow Flats, etc.)

## **University of Utah, Salt Lake City**

### 28 October 2003

There's not way there's enough petrol in Utah to make up for the losses incurred through the destruction of our land. Keep Utah beautiful and seek alternative energy.

Mining and archeological sites need to be compatible. Shared use seems to be very successful; have had good experiences with mutual cooperation.

No drilling and no grazing (anywhere)

Leave it the way it is, everything along 191. Leave cultural resources intact, like old cars and mining equipment—really fun to look at.

Moab is wild...keep it that way. No jeeps, mining or drilling; just say no.

#### Red Butte Garden, Salt Lake City

#### **13 November 2003**

Regulate, regulate, regulate. Enforce those that cannot respect the land.

Don't let the few affect the whole. Before you make decisions, make sure a majority of the public are involved. Not enough people are involved in the decisions because it is hard to find the facts. The BLM needs to get the info and make it accessible to the public. What can the individual do? Tell us.

Protect the public access to public road on public lands.

I am a small miner. This is how I make my living. You folks do a good job with the regulations that we follow. Even though we aren't the majority, we have historically done this and as a new generation of natural resource finders, producers, I want to keep my way of living.

Utah needs to designate Wild and Scenic river access and protection

Protect the ruins.

More trails for everyone.

Don't let a group of rich loud mouths who have moved to Moab make all of the decisions.

Protect lands for use, not from use.

Any use that by its nature limits or destroys the value of the use by another should be very limited so that the best use (one that supports not destroys what is truly special about that place) can be supported generation upon generation upon generation and not become less.

So many comments about keeping the land open for us all—yes—but that means keeping wilderness values in the places they remain—silence, pristine conditions, respect for nature; there are lots of trails.

Don't commit SUWA-cide.

Public lands are for the people, who are the real environmentalists.

Have yet to see SUWA huggers at BLM cleanups! It's pretty easy to be a SUWA hugger from your desk back east.

This is our land, let us enjoy it. By the way, keep up the good work, BLM.

## Moab & Monticello Resource Management Plan Public Scoping Comments May 2004

#### Moab

## **Air Quality**

**AQ 1 Comment:** The air quality in Moab and Monticello FO should also be managed as PSD Class I areas, if not, BLM management practices should not degrade the PSD Class I status of the adjacent National Parks.

Comment Letter: O-0027

**AQ 2 Comment:** Site specific project proposals including special events should be reviewed for compliance with existing air quality laws and policies.

Comment Letter: O-0027

**AQ 3 Comme nt:** Mitigation measures should be incorporated into project proposals to reduce air quality degradation.

Comment Letter: O-0027

**AQ 4 Comment:** BLM should take a proactive approach to managing air quality by, among other things: gathering baseline data, setting aggressive standards, requiring any actions on public lands to meet those standards, analyzing the cumulative impact of any proposed actions on all lands bought within the Resource Area and all areas that contribute air pollutants, establish an effective air quality monitoring program, and halt any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

Comment Letter: O-0031

**AQ 5 Comment:** The BLM needs to consider and monitor for the potential air quality impacts to Class I air sheds, such as adjacent Canyonlands National Park and Dark Canyon Wilderness Area.

Comment Letter: O-0031

## **Cultural Resources**

**CR 1 Comment:** Hovenweep National Monument is currently in the process of developing a General Management Plan. There may be opportunities for cooperation in the management of Hovenweep and related archeological sites on nearby BLM lands.

**CR 2 Comment:** Because of relationship of the Hovenweep sites to those on BLM lands, there may be a need for special stipulations and/or designations such as ACECs on BLM lands in the vicinity of Hovenweep.

Comment Letter: G-0004

**CR 3 Comment:** We oppose BLM Instruction Memoranda 98-131-2, which prohibit reburial Native American human remains excavated from BLM land and subject to NAGRPA. Therefore, we oppose all ground disturbing activities on BLM land with the potential to disturb the remains of our ancestors.

Comment Letter: G-0008

**CR 4 Comment:** It would be good to have a fence or even signs nearby asking people to please respect this lost art.

Comment Letter: G-0016

**CR 5 Comment:** It would be a good idea if we could have a list of the plants in that area then we could identify what they are used for, so that it may help in the resource values.

Comment Letter: G-0016

**CR 6 Comment:** BLM should increase public education and appreciation of archaeological resources through interpretation of sites that are easily accessible and therefore vulnerable to damage.

Comment Letter: G-0027

**CR 7 Comment:** Cultural surveys in high use areas, such as along rails and open routes should be prioritized to ensure protection of vulnerable resources.

Comment Letter: G-0027

**CR 8 Comment:** Where vulnerable sites exist in the backcountry and there are no available resources for monitoring or protection the BLM should not disclose or identify locations or encourage visitation or extractive uses in these areas.

Comment Letter: G-0027

**CR 9 Comment:** We request that the BLM Field Office prepare or contract for the preparation of an up to date Class I Overview of the cultural resources of the Field Office to accompany the environmental impact assessment.

**CR 10 Comment:** As the Field Office proceeds to develop the scope of work for this Class I Overview, we would like to see that the scope of work and the resource management plan are written to fulfill the BLM's compliance responsibilities with section 110 of the National Historic Preservation Act, as well as its Section 106 responsibilities.

Comment Letter: O-0028

**CR 11 Comment:** Preparation of updated historic property evaluations would then serve as the guide for the cultural resource use allocations specified in the Information Bulletin and in all BLM resource management plans.

Comment Letter: O-0028

**CR 12 Comment:** We also suggest that as alternatives are developed for the resource management plan and environmental impact statement, that specific consideration be given to the development of section 106 guidance for the Field Office.

Comment Letter: O-0028

**CR 13 Comment:** We would like to see specific information tabulated on the relationships between site types and the distribution of size and shapes of areas of potential effect based on undertaking types.

Comment Letter: O-0028

**CR 14 Comment:** We also recommend that with preparation of the environmental impact statement and the public outreach and consultation efforts underway, it would be timely for the Field Office to update their inventory of cultural items as defined under NAGPRA.

Comment Letter: O-0028

**CR 15 Comment:** The use of the term "sacred waterways" is inappropriate and should be revised.

Comment Letter: O-0029a

**CR 16 Comment:** The RMP process should identify broad areas where cultural sites are at risk and employ one or more of these administrative measures to protect these resources.

Comment Letter: O-0031

**CR 17 Comment:** Prior to designation in the RMP, all potential ORV routes must be surveyed for cultural resources; no travel may be permitted until such survey has occurred, and protection from degradation is ensured.

**CR 18 Comment:** Protect archaeological sites; respect Indians and their ancestors.

Comment Letter: I-2213, I-2248, I-2249, I-2254, I-2265, I-2284, I-2555, I-2258, I-2867, I-3003, I-3127, I-3151, I-3152

### **Lands and Realty**

**LR 1 Comment:** The land use plan should acknowledge that there will be "no net loss" of public lands in the planning area. Opportunities for exchanges that would benefit the large picture of public land management in the area should be explored, however, disposals per se should be avoided.

Comment Letter: G-0005

**LR 2 Comment:** Like to see the RMP identify lands suitable for acquisition, trade or disposal.

Comment Letter: O-0022

## **Mineral Development**

**MD 1 Comment:** The BLM should designate as "No Surface Occupancy" for oil gas development all lands proposed for wilderness designation in the America's Redrock Wilderness Act

Comment Letter: G-0004, O-0012, I-1277 to I-1436, I-1438 to I-2157

**MD 2 Comment:** Reasonable measures should be required to minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed

Comment Letter: O-0012, I-0001 to I-0898, I-0901 to I-1276

**MD 3 Comment:** BLM should not open any areas to leasing unless they have first made a determination that the oil/gas potential of the area outweighs recreational, wilderness, etc. Values

Comment Letter: O-0016

**MD 4 Comment:** BLM must consider all areas with know potential for natural gas and oil as viable lands to be leased for NG&O development, regardless of specific interest in those areas

Comment Letter: O-0026, I-0001 to I-0898, I-0901 to I-1277 to I-1436, I-1438 to I-2157, I-3388

**MD 5 Comment:** It is important that future opportunities to explore for and develop natural gas and oil resources not be indiscriminately foreclosed

**MD 6 Comment:** BLM must acknowledge that natural gas and oil exploration and development activities are fully compatible with semi-primitive recreational values and opportunities (sensitive areas)

Comment Letter: O-0026

**MD 7 Comment:** When considered desired future conditions for minerals development BLM should determine that leasing will only take place when the natural and ecological processes and resiliency are assured

Comment Letter: O-0027

**MD 8 Comment:** BLM should avoid a no-lease or no-surface occupancy stipulation decision for areas allocated to semi-primitive recreation in all alternatives.

Comment Letter: O-0029a

**MD 9 Comment:** Each alternative should support the ability of the Oil and gas industry to travel "cross country" for exploration purposes

Comment Letter: O-0029a

**MD 10 Comment:** BLM must include a detailed review of the Oil and Gas potential identified by the most current USGS Resource Assessment. Information should include, but not limited to "play type", producing formations and the projected methods for discovery

Comment Letter: O-0029a

**MD 11 Comment:** The BLM should focus on lease stipulations adverse impacts to oil and gas supply on realistic estimates of economically recoverable resources, not just technically recoverable resources

Comment Letter: O-0031

**MD 12 Comment:** The BLM should use high range and low range of fuel prices in its economically recoverable analysis for oil and gas

Comment Letter: O-0031

**MD 13 Comment:** RMP should address the socio-economic impacts of the boom and bust development cycle associate with oil and gas drilling on surrounding communities

Comment Letter: O-0031

**MD 14 Comment:** RMP should fully protect the remaining undeveloped lands in the Monticello resource area.

**MD 15 Comment:** Simply because an area is currently leased should not prevent consideration of designations that conflict with oil and gas development

Comment Letter: P-0031

**MD 16 Comment:** RMP should propose withdrawal of certain areas from mineral entry. These areas would include, but not be limited to lands proposed for wilderness designation, land containing cultural resources, ACECs, important habitat, water resources and unique geologic formations.

Comment Letter: O-0031

**MD 17 Comment:** Do not see mineral development permits in areas with high scenic, recreational, wilderness or wildlife values. Few resources are not worth permanent damage to the area.

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Comment Letter:I-2192, I-2115, I-2221, I-2238, I-2240, I-2252, I-2272, I-2279, I-2280, I-2285, I-2286, I-2320, I-2362, I-2366, I-2367, I-2370, I-2371, I-2373, I-2375, I-2389 to I-2391, I-2393, I-2394, I-2396, I-2397, I-2401, I-2495, I-2498, I-2501, I-2512, I-2518, I-2529, I-2530, I-2539, I-2551, I-2555, I-2594, I-2598, I-2610, I-2624, I-2627, I-2630, I-2638, I-2643, I-2668, I-2676, I-2684, I-2688, I-2689, I-2694, I-2696, I-2728, I-2746, I-2778, I-2784, I-2786, I-2798, I-2804, I-2815, I-2825, I-2830, I-2835, I-2847, I-2893, I-2909, I-2911, I-2914, I-2932, I-2938, I-2941, I-2950, I-2953, I-2954, I-2976, I-2982, I-2989, I-2995, I-2996, I-2999, I-3010 to I-3013, I-3015, I-3049, I-3051, I-3068, I-3070, I-3118, I-3137, I-3141, I-3142, I-3144, I-3145, I-3151, I-3152, I-3162, I-3172, I-3182, I-3190, I-3197, I-3201 to I-3203, I-3206, I-3208 to I-3210, I-3219, I-3221, I-3222, I-3243, I-3244, I-3293, I-3295 to I-3298, I-3300 to I-3303, I-3306, I-3308, I-3347, I-3381, I-3385
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**MD 18 Comment:** Mineral development fess should

Comment Letter:I-2231, I-2342, I-2975, I-3170, I-3288

**MD 19 Comment:** Promote energy development.

Comment Letter: I-2264, I-2283, I-2339, I-2344, I-2407, I-2621, I-3256, I-3362, I-3364

**MD 20 Comment:** Protection for the bookcliffs.

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Comment Letter:I-2193, I-2197, I-2207, I-2208, I-2222, I-2255, I-2266, I-2267, I-2277, I-2285, I-2346, I-2347, I-2355, I-2369, I-2394, I-2546, I-2556, I-2630, I-2644, I-2651, I-2694, I-2740, I-2777, I-2786, I-3140, I-3148, I-3155, I-3163, I-3196, I-3201, I-3202, I-3204, I-3205, I-3212, I-3335, I-3338, I-3339, I-3349, I-3351 to I-3353, I-3359, I-3369
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## **Miscellaneous**

**MS 1 Comment:** As an agency within the Utah Department of Natural Resources, we support multiple use on public lands, but request that the viewshed of Dead Horse Point be considered when evaluating locations for oil and gas leasing.

Comment Letter: G-0003

**MS 2 Comment:** Plans for noxious weed management after fires must also be detailed in the revised plan.

Comment Letter: G-0005

**MS 3 Comment:** We believe that this area should be exposed to the world by allowing filming to take place without such restrictive regulations, which have deterred filmmakers from coming to our County in the past.

Comment Letter: G-0020

**MS 4 Comment:** Law enforcement on public lands should be handled by the Sherriff Office. The BLM Rangers are strictly Resource Officers and are to be recognized by the Utah Academy as law enforcement officers. We believe that this is a liability to the County.

Comment Letter: G-0020

**MS 5 Comment:** Canyonlands Field Institute would like to nominate a 20 acre parcel for consideration for disposal by the BLM. The exact lease descriptions would include the current 8.5 acre lease in Professor Valley; the remaining boundaries to be determined through examination with BLM staff.

Comment Letter: O-0004

**MS 6 Comment:** (Castleton Tower) We believe the only way to protect this area from further degradation is to stop the motorized use at established parking areas at particular access points. Education must be a part of the management in this area

Comment Letter: O-0007

**MS 7 Comment:** Education and community outreach should be the centerpiece of any land management plan that may, in some form, restrict the activities of an established industry or user group.

**MS 8 Comment:** RMP revisions should consider the role that education and public outreach will play in managing human powered recreation-including climbing-and in promoting stewardship and minimum impact practices by this user community.

Comment Letter: O-0012, I-2540, I-2840, I-2889, I-2901, I-2923, I-2972, I-3043, I-3090, I-3093, I-3109, I-3121

**MS 9 Comment:** New lights in remote areas are strongly discouraged. In rare cases where lights are necessary, they must be fully shielded.

Comment Letter: O-0016, I-2390, I-2627, I-2847, I-292, I-3011, I-3051

**MS 10 Comment:** BLM should impose decibel limits on dirt bikes and other ORVs as done in California.

Comment Letter: O-0016, I-2499, I-2594, I-2598, I-2938, I-2941, I-2954, I-2976, I-3010, I-3049, I-3068, I-3118, I-3295, I-3297, I-3298, I-3304, I-3381

**MS 11 Comment:** BLM should include measures in this plan to prevent the proliferation of unnecessary lighting in remote areas. The public is becoming more aware of the scarcity of places where one can see the unspoiled night sky, with its full complement of stars and planets. New lights at BLM facilities should be limited to the minimum needed, and those should be shielded.

Comment Letter: O-0023

**MS 12 Comment:** The new RMP should be very specific regarding the status of the VRM classifications. The new RMP should specifically establish VRM inventories as a guideline, and that they should not be considered a "standard" in any way.

Comment Letter: O-0029a

**MS 13 Comment:** I recommend that BLM explicitly identify soil quality as an issue to address in the RMP revision. The concept is parallel to air and water quality and an extensive body of scientific literature describes the importance of soil quality as an indicator of sustainable land management.

Comment Letter: O-0030

**MS 14 Comment:** With respect to riparian ecosystems, it is important to recognize that "proper functioning condition" alone is an insufficient descriptor of desired conditions for riparian ecosystems.

**MS 15 Comment:** I recommend that BLM consider augmenting the standard approach for conducting PFC assessments to include indicators which enable BLM to assess riparian habitat conditions in addition to the prerequisite functioning of hydrologic process.

Comment Letter: O-0030

**MS 16 Comment:** I recommend that BLM consider assessing the condition of upland ecosystems in a manner parallel to riparian PFC assessments.

Comment Letter: O-0030

**MS 17 Comment:** We submit that all areas proposed for wilderness designation must be designated as VRM I to preserve the character of the landscape.

Comment Letter: O-0031

**MS 18 Comment:** All VRM areas I and II must be classified as "no leasing" or at a minimum, "no surface occupancy" and travel must be restricted to limited designated roads.

Comment Letter: O-0031

MS 19 Comment: Current roads and trails provide access to fight fires and fuel reduction projects. Closures would make that difficult.

Comment Letter: I-2886, I-3383

**MS 20 Comment:** Discourage scenic air ours over backcountry areas.

Comment Letter: I-2371, I-2594, I-2746, I-2938, I-2954, I-2976, I-3010, I-3049, I-3068, I-3118, I-3298, I-3302

**MS 21 Comment:** Support the multiple use mandate.

Comment Letter: I-2200, I-2201, I-2228, I-2268, I-2282, I-2291, I-2307, I-2341, I-2389, I-2390, I-2503, I-2588, I-2677, I-2793, I-2840, I-2875, I-2889, I-2891, I-2901, I-2905, I-2983, I-3000 to I-3002, I-3016, I-3025, I-3052, I-3073, I-3078, I-3081, I-3084, I-3093, I-3097, I-3102, I-3121, I-3139, I-3143, I-3144, I-3291, I-3372, I-3334, I-3362, I-3382

MS 22 Comment: Seek feedback from all users.

**MS 23 Comment:** Restricting OHV use will be detrimental to the local economy. Tourism dollars will be lost.

Comment Letter: I-236, I-2398, I-2492, I-2515, I-2517, I-2523, I-2525, I-2573, I-2575, I-2576, I-2584, I-2611, I-2631, I-2633, I-2655, I-2666, I-2669, I-2673, I-2677, I-2685, I-2703, I-2764, I-2769, I-2773, I-2809, I-2825, I-2828, I-2839, I-2853, I-2856, I-2861, I-2879, I-2895, I-2906, I-2908, I-2924, I-2945, I-2959 to I-2963, I-2990, I-2993, I-3023, I-3024, I-3027, I-3031, I-3035 to I-3037, I-3044, I-3047, I-3059, I-3066, I-3071, I-3080, I-3089, I-3091, I-3096, I-3111, I-3112, I-3122, I-3129, I-3152, I-3327

**MS 24 Comment:** Preserve the natural quiet of the backcountry.

Comment Letter: I-2291, I-2340, I-2391, I-2398, I-2684, I-2746, I-3145, I-3161, I-3295, I-3298, I-3302, I-3339, I-3340, I-3351

**MS 25 Comment:** Prevent fugitive dust.

Comment Letter: I-2400, I-2499, I-3151, I-3347

## **Off Highway Vehicles**

**OHV 1 Comment:** RR4Ws would like the following routes to be considered for inclusion in the BLM OHV route inventory, as requested by Planning Bulletin #3: "The Rusty Nail," "Where Eagles Dare", "Escalator" and "Gates of Hell" on Hells Revenge, "The Pickle", "Killer Kane Mines"

Comment Letter: O-0002, I-3389, I-3390

**OHV 2 Comment:** All OHV travel should be restricted to designated trails. These trails should not be in WSAs, other lands with wilderness quality nor in riparian areas. The plan should include maps and sufficient marking so that the appropriate use is clear to the user. Provisions will need to be made to educate the users and enforce restrictions.

Comment Letter: O-0003, I-0001 to I-0898, I-0901 to I-1276

**OHV 3 Comment:** The new RMP must provide increased OHV opportunities to meet the current and anticipated demand. In addition, a designated "open" area for all types of motorized vehicles, where travel is to restricted to designated routes, would help off-route travel for enthusiasts who are looking for "play areas" and "extreme" challenges

Comment Letter: O-0006

**OHV 4 Comment:** Increased education and enforcement of BLM OHV policy is critical

Comment Letter: O-0006, I-2408 to I-2436

**OHV 5 Comment:** Special Recreation Permits for any organized group activity should not be implemented

Comment Letter: O-0006, I-0001 to I-0898, I-0901 to I-1276, I-1277 to I-1436, I-1438 to I-2157, I-2174, I-2256, I-2261, I-2263, I-2302, I-2305, I-2326, I-2327, I-2348 to I-2352, I-2357, I-2372, I-2388, I-2406, I-2504, I-2513, I-2520, I-2540, I-2345, I-2564, I-2599, I-2613, I-2677, I-2704, I-2707, I-2708, I-2720, I-2722, I-2759, I-2771, I-2775, I-2779, I-2782a, I-2792, I-2802, I-2806, I-2833, I-2840, I-2844, I-2880, I-2901, I-2905, I-2923, I-2943, I-2951, I-2970, I-2978, I-3009, I-3066, I-3090, I-3103, I-3109, I-3113, I-3114, I-3117, I-3129, I-3198, I-3199, I-3214, I-3218, I-3251, I-3298, I-3316, I-3329, I-3332, I-3382

**OHV 6 Comment:** Enforcement of current regulations and any new regulations contained in the RMP must be a top priority since some OHV operators violate closure signs and set off on unroaded, un-trailed lands.

Comment Letter: O-0010, I-2408 to I-2436

**OHV 7 Comment:** BLM must also ensure that these routes and open areas are established in a way that minimizes conflicts with other users, including human-powered recreational users such as climbers

Comment Letter: O-0012

**OHV 8 Comment:** Because of off-road vehicle use in the SE Utah RMP areas often causes significant irreparable damage to fragile desert soil and vegetation, sensitive wildlife and its habitat, and cultural resources, the BLM should designate most of the SE Utah RMP as "closed" to off-road vehicles

Comment Letter: O-0012, I-0001 to I-0898, I-0901 to I-1436, I-1438 to I-2157, I-3388

**OHV 9 Comment:** RMP revisions should include a comprehensive travel plan that evaluates all forms of travel, including hiking/biking, horseback, biking and OHV use

Comment Letter: O-0012

**OHV 10 Comment:** If the world class primitive experiences currently found in SE Utah are to be maintained, the SE Utah RMP revisions should include alternatives that have measures that significantly protect against an increase in motorized recreation in the area

Comment Letter: O-0012

**OHV 11 Comment:** Vehicles should be restricted to designated roads and trails throughout the entire resource areas-no "open" ORV play areas

Comment Letter: O-0016, I-2408 to I-2436, I-3390

**OHV 12 Comment:** the RMP should explicitly document the purpose of each open route

Comment Letter: O-0016, I-2408 to I-2436

**OHV 13 Comment:** BLM should explicitly analyze the ability of any open route to withstand greatly increased use levels.

Comment Letter: O-0016

**OHV 14 Comment:** In order to facilitate enforcement, there should be a 'closed unless signed open' policy.

Comment Letter: O-0016

**OHV 15 Comment:** Needs to be fair allocation between motorized and non-motorized users. Non-motorized should comprise at least 40% of the total designated road/trail mileage \*See site specific route comments\*

Comment Letter: O-0016

**OHV 16 Comment:** The present country road network provides the base for and organized system but some short segments need to be added to complete a comprehensive well managed system for large and small loops

\*See O-00013 for maps and documents describing segments needed for a successful trail system

Comment Letter: O-0019

**OHV 17 Comment:** All lands will have OHV designations (open, limited, closed) and those areas designated as "limited" will have specific road and trail designations made

Comment Letter: O-0020

**OHV 18 Comment:** United recommends that if the agency determines through proper analysis that any changes to current designations should be made that the agency move "limited to existing"

Comment Letter: O-0020

**OHV 19 Comment:** ORBA recommends that recreation use of OHVs and industry activities be considered in the process of designating areas as "open, limited or closed."

Comment Letter: O-0024

**OHV 20 Comment:** Where appropriate and when done through proper planning pursuant to the NEPA and only when the agency has clearly demonstrated that cross-country travel is not appropriate, the agency should consider implementation of a 'limited to existing' designation. This is an example of an appropriate restriction applied to an appropriate use to achieve a level of resource protection

**OHV 21 Comment:** The special recreation permit process is too hard and too expensive for OHV clubs. Please just keep the SRP process out of your revised RMP.

Comment Letter: O-0025

**OHV 22 Comment:** Your new plan should provide instructions to land manager to engage in cooperative management efforts with OHV groups.

Comment Letter: O-0025

**OHV 23 Comment:** The new plan should recognize OHV clubs and organizations as a resource the BLM can use to educate the public on proper backcountry recreational uses.

Comment Letter: O-0025

**OHV 24 Comment:** The new plan must prudently provide increased OHV recreation opportunities to meet the current and anticipated demand.

Comment Letter: O-0025

**OHV 25 Comment:** The new RMP should allow for "adopt a trails" and other agreements in order to manage OHV use. We do not support the manner in which BLM has relied on closures to deal with resource issues.

Comment Letter: O-0025

**OHV 26 Comment:** GCT recommends that the "open" designations for OHV use on BLM lands be discontinued and that all recreational use of this kind be restricted to designated roads and trails. X country motorized travel should be prohibited due to the irreparable damage that occurs with this type of use and which renders lands no longer viable for multiple use

Comment Letter: O-0027

**OHV 27 Comment:** BLM should also consider the value of providing recreational experiences where there is no intrusion from noise or air pollution associated with motorized travel.

Comment Letter: O-0027

**OHV 28 Comment:** Where routes are not deemed necessary such as when there are numerous routes to the same destination, they should be closed to motorized and mechanized public access.

Comment Letter: O-0027, I-2192, I-2203 to I-2205, I-2207, I-2211, I-2213, I-2218, I-2221 to I-2223, I-2230, I-2232, I-2233, I-2239, I-2242, I-2244, I-2246, I-2247, I-2249, I-2250, I-2252 to I-2254, I-2260, I-2267, I-2269 to I-2271, I-2274, I-2275, I-2277, I-2285, I-2292, I-2295, I-2320, I-2331, I-2332, I-2334, I-2337, I-2338, I-2340 to

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I-2343, I-2346, I-2347, I-2354, I-2355, I-2361, I-2366, I-2368, I-2370, I-2371, I-2373,
I-2374, I-2389, I-2391, I-2393, I-2395, I-2398, I-2400 to I-2403, I-2495, I-2498,
I-2499, I-2501, I-2512, I-2526, I-2529, I-2530, I-2539, I-2572, I-2594, I-2598, I-2603,
I-2617, I-2627, I-2638, I-2640, I-2644, I-2651, I-2668, I-2675, I-2676, I-2687, I-2689,
I-2696, I-2710, I-2712, I-2732, I-2746, I-2750, I-2776, I-2783, I-2784, I-2789, I-2798,
I-2804, I-2805, I-2815, I-2825, I-2830, I-2832, I-2835, I-2838, I-2843, I-2845, I-2847.
I-2867, I-2868, I-2870, I-2876, I-2882, I-2891 to I-2893, I-2909, I-2914, I-2927,
I-2938, I-2941, I-2944, I-2947, I-2950, I-2953, I-2954, I-2976, I-2982, I-2987, I-2989,
I-2995, I-2996, I-2999, I-3010 to I-3012, I-3015, I-3029, I-3049, I-3051, I-3068,
I-3097, I-3106, I-3118, I-3125, I-3127, I-3128, I-3131, I-3137, I-3138, I-3140, I-3141,
I-3144, I-3145, I-3148, I-3149, I-3151, I-3152, I-3154, I-3155, I-3161, I-3165, I-3168,
I-3172, I-3182, I-3201, I-3203, I-3205 to I-3210, I-3213, I-3215, I-3216, I-3221 to
I-3223, I-3246 to I-3248, I-3252, I-3273, I-3293 to I-3295, I-3300, I-3304, I-3306,
I-3308, I-3310, I-3312, I-3314, I-3318, I-3319, I-3323, I-3328, I-3333, I-3336 to
I-3338, I-3340 to I-3342, I-3345, I-3347 to I-3352, I-3354, I-3356, I-3357, I-3359 to
I-3361, I-3371, I-3375 to I-3381, I-3383, I-3384, I-3386
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**OHV 29 Comment:** We recommend that road densities be at the maximum 2 miles per square mile and preferably at 1 mile per square mile

Comment Letter: O-0027

**OHV 30 Comment:** BLM should employ law enforcement personnel and have cooperative agreements with Moab and Grand County, Monticello and San Juan County law enforcement officials to patrol areas popular with OHV users to ensure that they are following designated travel ways and to avoid damage from new user-created routes and especially during permitted Special Events

Comment Letter: O-0027

**OHV 31 Comment:** 031- nearly every action closes a significant number of roads and trails. The proposed action must not contribute further to the significant cumulative impact on access and motorized recreation that has affected the public

Comment Letter: O-0005

**OHV 32 Comment:** There is a need for more, not less multiple-use recreation opportunities including motorized access and motorized trails

Comment Letter: O-0005

**OHV 33 Comment:** Issues with hunting and motorized recreation can be mitigated by implementing hunting season closures and education measures. Motorized closures based on noxious weeds are not justified

**OHV 34 Comment:** Travel management should be a process to quantify and address the needs of the public for motorized access and motorized recreational opportunities

Comment Letter: O-0005

**OHV 35 Comment:** BLM should provide vehicle assisted public land visitors a full range of recreational opportunity. BLM should formulate a complete and accurate inventory of currently used travel ways.

Comment Letter: O-0005

**OHV 36 Comment:** The BLM's new plan should provide instructions to land managers to engage in cooperative management efforts with OHV groups. The new plan should recognize OHV clubs and organizations as a resource the BLM can use to leverage OHV grant money and to educate the public on proper backcountry recreational use

Comment Letter: O-0005

**OHV 37 Comment:** The BLM's new plan must prudently provide increased OHV recreation opportunities to meet the current and anticipated demand

Comment Letter: O-0005

**OHV 38 Comment:** We request that travel management alternatives be developed with the objective of including as many roads and trails as possible and addressing as many problems as possible by using all possible mitigation measures

Comment Letter: O-0029a

**OHV 39 Comment:** BLM should incorporate cooperative OHV management efforts in all of the alternatives

Comment Letter: O-0029a

**OHV 40 Comment:** \*See appendix for list of 16 General Comments on OHV Planning pgs. 21-23

Comment Letter: O-0029a

**OHV 41 Comment:** Educate non-motorized visitors about when and where they may encounter vehicle traffic or where to avoid traffic, and educate the vehicle assisted visitor as to where the road or trail might be shared with non-motorized visitors

Comment Letter: O-0029a

**OHV 42 Comment:** Reroute either use so as to avoid sections of roads or trails that are extremely popular with both groups

Comment Letter: O-0029a

**OHV 43 Comment:** No special commercial or special rec permits should be issued for ORV use in the Monticello Field Office

Comment Letter: O-0031

**OHV 44 Comment:** The generally accepted definition of OHV applies to motorized vehicles. ORBA recommends the description of Issue #9 be expanded to be inclusive of motorized and mechanical recreation activities

Comment Letter: O-0024

**OHV 45 Comment:** BLM should avoid statements regarding vehicle use trampling vegetation and compressing soils, or a statement that driving a vehicle at wildlife will cause said wildlife to be disturbed. What is relevant is to disclose what, if any, the significant impacts to the human environment for any of the proposed actions are.

Comment Letter: O-0029a

**OHV 46 Comment:** BLM planning must provide for the dramatic increasing demand for OHV recreation opportunities and anticipate even more demand in future years. Alternatives must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand

Comment Letter: O-0029a

**OHV 47 Comment:** Planning team should look to County and Local Governments as well as individuals and user groups for assistance in identifying opportunities for OHV recreation

Comment Letter: O-0029a

**OHV 48 Comment:** All alternatives should include instructions to engage in cooperative management with OHV groups and individuals

Comment Letter: O-0029a

**OHV 49 Comment:** Alternatives should include areas where OHV trails can be constructed and maintained when demand increases

Comment Letter: O-0029a

**OHV 50 Comment:** The planning team should carefully consider displaced use. Assuming that closures are eminent some area, one could calculate approximately how much will be displaced to other areas. The planning team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use

Comment Letter: O-0029a

**OHV 51 Comment:** BLM should look for areas that can be designated "open" and or "intensive OHV management areas" and incorporate these into each alternative

Comment Letter: O-0029a

**OHV 52 Comment:** The Monticello RMP should pay particular attention to the impacts of off road vehicles and ensure that lands within the resources area, including areas previously inventoried and found to contain wilderness character or areas proposed by UWC and within America's Redrock Wilderness Act, are not damaged and the conflicts with other visitors are minimized

Comment Letter: O-0031

**OHV 53 Comment:** Adopt a more active management style with regards to OHV. By this we mean specifically designate routes/roads/trails as open or closed. Do not leave public lands as open to off-trail travel and end the designation as "open to existing roads and trails".

Comment Letter: G-0003

**OHV 54 Comment:** There are occasional unauthorized entries of ORVs into Southeast Utah Group Parks. We would encourage ORV travel in the vicinity of the parks to be prohibited, or limited to clearly designated routes, to deter this problem in the future.

Comment Letter: G-0004, G-0018

**OHV 55 Comment:** Required signing and enforcement needed to carry out vehicle management must be identified in the plan

Comment Letter: G-0005

**OHV 56 Comment:** Motorized or mechanized trail systems and maintenance of these systems should be a priority.

Comment Letter:I-2551, I-2617, I-2653, I-2712, I-2943

**OHV 57 Comment:** Do not close or place limitations on trails.

Comment Letter:I-2159 to I-2169, I-2171 to I-2181, I-2210, I-2214, I-2224, I-2225, I-2229, I-2230, I-2236, I-2237, I-2251, I-2257, to I-2259, I-2261, I-2263, I-2276, I-2278, I-2287 to I-2289, I-2294, I-2296, to I-2315, I-2317, I-2318, I-2322, I-2323, I-2325 to I-2329, I-2333, I-2341, I-2344, I-2345, I-2352, I-2356 to I-2358, I-2360, I-2363 to I-2365, I-2376 to I-2384, I-2386 to I-2388, I-2394, I-2399, I-2405, I-2483 to I-2488, I-2491, I-2492, I-2494, I-2497, I-2500, I-2502, I-2506, I-2508 to I-2511, I-2514 to I-2517, I-2521, I-2523 to I-2525, I-2527, I-2531 to I-2538, I-2541, I-2542, I-2544, I-2547 to I-2549, I-2552, I-2554, I-2557, I-2562, I-2564, I-2565, I-2567 to I-2569, I-2571, I-2573 to I-2577, I-2579 to I-2581, I-2583, I-2586, I-2589, I-2590, I-2592, I-2593, I-2595 to I-2597, I-2599 to I-2601, I-2604 to I-2607, I-2609,

I-2612, I-2614 to I-2616, I-2618, I-2619, I-2621 to I-2623, I-2625, I-2626, I-2628, I-2631 to I-2637, I-2639, I-2641, I-2642, I-2645 to I-2647, I-2649, I-2650, I-2677 to I-2686, I-2690 to I-2693, I-2695, I-2697 to I-2703, I-2706, I-2707, I-2709, I-2712 to I-2719, I-2721, I-2723, I-2727, I-2729 to I-2735, I-2737, I-2739, I-2741 to I-2743, I-2745, I-2748, I-2749, I-2752, I-2754, I-2755, I-2758 to I-2760, I-2762 to I-2769, I-2771 to I-2775, I-2779 to I-2782, I-2785, I-2787, I-2788, I-2790, I-2791, I-2793 to I-2797, I-2800 to I-2803, I-2806 to I-2811, I-2813, I-2814, I-2816 to I-2824, I-2826 to I-2829, I-2831, I-2833, I-2834, I-2837, I-2839 to I-2842, I-2844, I-2846, I-2848 to I-2857, I-2859, I-2861, I-2862, I2864, I-2865, I-2871, I-2872, I-2874, I-2875, I-2877, I-2881, I-2883 to I-2887, I-2889, I-2890, I-2894 to I-2903, I-2906 to I-2908, I-2910, I-2912, I-2915 to I-2921, I-2924 to I-2926, I-2928 to I-2931, I-2933, I-2934, I-2936, I-2937, I-2939, I-2942, I-2943, I-2945, I-2946, I-2948, I-2949, I-2952, I-2955 to I-2960, I-2962 to I-2971, I-2973, I-2974, I-2978 to I-2981, I-2983, I-2985, I-2986, I-2990, I-2992 to I-2994, I-3000 to I-3002, I-3004, I-3008, I-3014, I-3016, I-3017. I-3019 to I-3021, I-3023 to I-3028, I-3030 to I-3033, I-3035 to I-3037, I-3039 to 3041, I-3044 to I-3048, I-3050, I-3052, I-3053, I-3056, I-3057, I-3059, I-3061, I-3066, I-3067, I-3069, I-3071, I-3072, I-3074 to I-3078, I-3080, I-3082 to I-3089, I-3091 to I-3096, I-3098, I-3099, I-3101 to I-3104, I-3107, I-3110 to I-3113, I-3115 to I-3117, I-3120 to I-3124, I-3126, I-3129, I-3130, I-3132 to I-3136, I 3139, I-3143, I-3146, I-3153, I-3156 to I-3160, I-3166, I-3167, I-3169, I-3171, I-3174, I-3176, I-3178 to I-3181, I-3183, I-3186 to I-3189, I-3191 to I-3195, I-3199, I-3214, I-3217, I-3218, I-3228 to I-3242, I-3249, I-3250, I-3253, I-3254, I-3256, I-3258 to I-3262, I-3266 to I-3272, I-3274 to I-3286, I-3291, I-3292, I-3311, I-3313, I-3316, I-3320 to I-3322, I-3326, I-3327, I-3329, I-3331, I-3332, I-3346, I-3355, I-3382

#### **OHV 58 Comment:** Provide enforcement in areas where OHV users do not stay on trails.

Comment Letter:I-2159 to I-2169, I-2171 to I-2173, I-2198, I-2210, I-2256, I-2274, I-2303, I-2328, I-2403, I-2512, I-2705, I-2710, I-2732, I-2742, I-2812, I-2872, I-2892, I-2913, I-2973, I-2974, I-3020, I-3035, I-3038, I-3087, I-3117, I-3126, I-3127, I-3131, I-3144, I-3149, I-3152, I-3230, I-3296, I-3333, I-3341, I-3350

#### **OHV 59 Comment:** Control commercial and organized OHV events and prohibit new events.

Comment Letter:I-2192, I-2203 to I-2206, I-2209, I-2269, I-2364, I-2363, I-2495, I-2498, I-2501, I-2518, I-2530, I-2531, I2539, I-2643, I-2676, I-2687, I-2688, I-2696, I-2728, I-2736, I-2784, I-2833, I-2835, I-2873, I-2932, I-2953, I-2989, I-3137, I-3149, I-3162, I-3170, I-3182, I-3184, I-3190, I-3196, I-3197, I-3288, I-3289, I-3290, I-3300, I-3308, I-3314, I-3317, I-3349 to I-3349g, I-3354, I-3358, I-3368, I-3373, I-3381

# **OHV 60 Comment:** The BLM should institute educational programs for OHV users to minimize impacts to the land.

Comment Letter:I-2159 to I-2169, I-2171 to I-2173, I-2210, I-2333, I-2508, I-2521, I-2613, I-2628, I-2690, I-2747, I-2755, I-2875, I-2886, I-2904, I-2926, I-2945, I-2951, I-2958, I-2961, I-3019, I-3020, I-3035, I-3038, I-3043, I-3054, I-3074, I-3077, I-3084, I-3117, I-3127, I-3131, I-3152, I-3225, I-3226, I-3246, I-3340

**OHV 61 Comment:** The BLM should institute a "permit policy" for OHV users to use public lands and help fund educational programs.

Comment Letter:I-2639, I-2665, I-2720, I-2737, I-2836, I-2886, I-2887, I-2942, I-2961, I-2973, I-3020, I-3038, I-3045, I-3046, I-3075, I-3257, I-3386

**OHV 62 Comment:** Restrict all motorized travel in riparian areas, wash bottoms, and sand dunes.

Comment Letter:I-2193, I-2207, I-2255, I-2266, I-2277, I-2285, I-2319, I-2355, I-2373, I-2390, I-2546, I-2556, I-2558, I-2617, I-2638, I-2689, I-2691, I-2740, I-2750, I-2751, I-2775, I-2792, I-2799, I-2805, I-2893, I-2950, I-3137, I-3148, I-3155, I-3163, I-3201, I-3202, I-3204, I-3205, I-3245, I-3303, I-3318, I-3323, I-3335, I-3338, I-3341, I-3361, I-3381

**OHV 63 Comment:** Open more trails to alleviate congestion.

Comment Letter:I-2538, I-2732, I-2737, I-2875, I-2889, I-2904, I-2905, I-2923, I-2951, I-2958, I-2970, I-2978, I-3004, I-3018, I-3038, I-3040, I-3089, I-3103, I-3227

**OHV 64 Comment:** BLM should mark trails with signs that designate proper use.

Comment Letter: I-2256, I-2303, I-2508, I-2611, I-2617, I-2653, I-2732, I-2805, I-2823, I-2875, I-2892, I-2911, I-2913, I-3021, I-3043, I-3054, I-3066, I-3090, I-3103, I-3126, I-3131, I-3149

## **Process Plan and Approach**

**PPA 1 Comment:** San Juan had a road agreement with the Bureau. The agreement served as a successful model for cooperation with the agency and outlined a working treatise for discussion and problem solving. The Bureau chose to dissolve that agreement in the mid-90s. It might be well to rethink that issue again during this planning effort.

Comment Letter: G-0006, I-1277 to I-1436, I-1438 to I-2157, I-3388

**PPA 2 Comment:** The county is interested in having an alternative developed that would address the full spectrum of recreation opportunities in the county.

Comment Letter: G-0006

**PPA 3 Comment:** RMP should meet a consistency review with the County Plan and that, in keeping with legal rights, the County be granted cooperating agency status.

**PPA 4 Comment:** It is important that ACEC, VRM, SMRA and WSR concepts should be viewed as aids to be used with the multiple use sustained yield mandate of FLPMA and are in compliance with the local County Plan.

Comment Letter: G-0009

**PPA 5 Comment:** "Range of Alternatives" development and selection process for the RMP should remain limited to local governments, state agencies, and federal agencies as cooperating agencies, as directed by the NEPA process.

Comment Letter: G-0009

**PPA 6 Comment:** Castle Rock-This area needs to see concentrated management to address the damage that has already occurred and manage the use for the future.

Comment Letter: G-0010

**PPA 7 Comment:** We would like to see the BLM make changes in management to protect the resource and close areas as is necessary.

Comment Letter: G-0010

**PPA 8 Comment:** The process being followed puts the average citizen at a great disadvantage. The process is inordinately confusing, cumbersome and intimidating.

Comment Letter: O-0005

**PPA 9 Comment:** The evaluation and decision-making does not distinguish between well-organized and funded environmental activism and the needs of 97% of public who may be independent and not well organized.

Comment Letter: O-0005

**PPA 10 Comment:** The proposed action must not contribute to the cumulative impact of many other actions that are effectively converting multiple use lands to limited use lands. This trend is not consistent with laws requiring management for multiple-use and is contrary to the needs of the public taken as a whole yet the trend continues.

Comment Letter: O-0005

**PPA 11 Comment:** We request that cumulative impacts of all motorized access and recreational closures be quantified, evaluated, and actions be taken to mitigate the significant cumulative impacts that have affected motorized recreationalist.

**PPA 12 Comment:** A broad multiple use alternative will accommodate more uses and have entirely acceptable environmental impacts and is therefore, a reasonable alternative.

Comment Letter: O-0005

**PPA 13 Comment:** Results form both the National Visitor Use Monitoring Program for Region 1 and our monitoring program document that non-motorized/wilderness visitors make up about 2.5% of the total visitors.

Comment Letter: O-0005

**PPA 14 Comment:** There are undoubtedly numerous minor and limited scope recreational impacts associated with climbing and camping - but these need to be managed in a context that address's their significance, but keeps it in perspective relative to the large scale impacts caused by OHVs, oil and gas extraction, grazing and other more intensive uses.

Comment Letter: O-0010

**PPA 15 Comment:** The AAC generally supports wilderness designation where appropriate, so we would request that the RMP not allow uses that would degrade these inventoried areas from future consideration as wilderness.

Comment Letter: O-0010

**PPA 16 Comment:** The AAC further requests that the RMP help move forward in any way it can formal Congressional designation of many wilderness areas, including the inventoried "Fisher Tower" area.

Comment Letter: O-0010

**PPA 17 Comment:** The AMS should include data on actual grazing use, and grazing management practices and goals for as far back as data exists. In the past, the BLM has averaged grazing use for five years and presented this in NEPA analyses. This approach is not adequate.

Comment Letter: O-0017

**PPA 18 Comment:** Past capability analysis may date back 30 years and be based on inadequate data and methods not inconsistent with BLMs current management obligations. For this reason, we recommend updating livestock capability assessments using the most recent NRCS soils data and current range condition monitoring.

Comment Letter: O-0017

**PPA 19 Comment:** The agency must accumulate sufficient data and consider relevant rigorous science to determine what uses are appropriate in any given area. \*\*\*\*Refer to the GSENM guidance document (CD) for a more detailed discussion of various factors, issues and conflicts.

**PPA 20 Comment:** When formulating a range of alternatives please include a range of access opportunities for motorized recreation in relation to a varied range of resource protection issues.

Comment Letter: O-0020

**PPA 21 Comment:** ORBA recommends that Moab and Monticello continue to develop their RMPs in a coordinated fashion and remove the effort to extend coordination to Price and Grand Junction offices.

Comment Letter: O-0024

**PPA 22 Comment:** Planning issues: 1) Additional SRMAs requiring enhanced or special management for rec uses or for protection of rec related resource values 2) Identifying rec. activity emphasis areas/ROS management zones; and 3) Identifying backcountry management objectives be eliminated as they are redundant with existing guidance and laws.

Comment Letter: O-0024

**PPA 23 Comment:** Agency should establish a process that: 1) defines the process for selecting specific roads and trails within the limited area; 2) defines criteria for limitations on use; 3) Establish the criteria used to define the limited areas or sub areas; 4) conduct the 'selection of a network of roads and trails' for all limited areas.

Comment Letter: O-0024

**PPA 24 Comment:** ORBA recommends that the route inventory and designation process be addressed on a separate schedule to allow for accurate and complete process and provide for a more complete definition of the recreation opportunity spectrum.

Comment Letter: O-0024

**PPA 25 Comment:** In developing the RFD, BLM must use a method that incorporates historical data on what types of impacts have actually occurred in the area through a collaborative effort with independents.

Comment Letter: O-0026

**PPA 26 Comment:** IPAMS supports a level of analysis for the RMP that will allow further environmental analysis of most natural gas and oil development to be tiered directly back to the RMP requiring no more than an EA.

Comment Letter: O-0026

**PPA 27 Comment:** BLM needs a drought management plan that can be acted on quickly to remove livestock and stop other damaging uses when public lands and wildlife are severely stressed.

**PPA 28 Comment:** BLM needs to add a provision ensuring management prescriptions are consistent, or at least not inconsistent with applicable law, including Utah state law.

Comment Letter: O-0029a

**PPA 29 Comment:** BLM should clarify which Land Health Standards apply to which activities and uses and should also clarify what "generally be evaluated on watershed basis" means.

Comment Letter: O-0029a

**PPA 30 Comment:** The Moab and Monticello Planning team(s) should work to improve public outreach and involvement.

Comment Letter: O-0029a

**PPA 31 Comment:** Consider alternative communication methods such as posting of major roads entering the Planning Area with notices and updates regarding the planning process.

Comment Letter: O-0029a

**PPA 32 Comment:** Consider a program to improve the publics ability to work with the NEPA process.

Comment Letter: O-0029a

**PPA 33 Comment:** See suggestions for website improvement - General Comments pg.3 & 5.

Comment Letter: O-0029a

**PPA 34 Comment:** I encourage BLM to work closely with NRCS, USGS, the NPS and other partners in the development and application of state-and-transition models to resource management.

Comment Letter: O-0030

**PPA 35 Comment:** BLM must analyze the Socio-Eco benefits of protecting wilderness character landscapes in the RMP as part of the analysis.

Comment Letter: O-0031

**PPA 36 Comment:** BLM must evaluate the costs and benefits of preventing damage to the spectacular, and extremely valuable cultural, wildlife, water, soil, vegetation, wilderness and primitive recreation resources in the Monticello Field Office area.

**PPA 37 Comment:** allow everyone to be apart of the alternatives process.

Comment Letter: I-2193, I-2222, I-2266, I-2292, I-2326, I-2327, I-2355, I-2369, I-2370, I-2390, I-2518, I-2359, I-2546, I-2556, I-2644, I-2676, I-2688, I-2696, I-2740, I-2777, I-2835, I-3155, I-3163, I-3202, I-3204, I-3220, I-3312, I-3315, I-3338, I-3349, I-3352, I-3353, I-3358, I-3359

## Rangelands and Grazing

**RG 1 Comment:** Utah FNAWS recommends that the BLM follow BLM guidelines and eliminate all domestic sheep allotments within the planning areas, as the opportunity arises.

Comment Letter: O-0001

**RG 2 Comment:** Specifically, UFNAES request that the BLM to follow through and convert the Floy Creek and Crescent junction allotments from domestic sheep to cattle.

Comment Letter: O-0001, I-0001 to I-0898, I-0901 to I-1276, I-3388

**RG 3 Comment:** Grazing should be prohibited in riparian areas.

Comment Letter: O-0003, I-2193, I-2197, I-2202, I-2203, I-2207, I-2208, I-2222, I-2239, I-2242, I-2259, I-2260, I-2275, I-2279, I-2280, I-2285, I-2292, I-2319, I-2337, I-2374, I-2522, I-2551, I-2556, I-2558, I-2559, I-2651, I-2740, I-2847, I-2984, I-2987, I-2998, I-3006, I-3022, I-3034, I-3042, I-3068, I-3148, I-3151, I-3152, I-3155, I-3162, I-3172, I-3202, I-3204, I-3205, I-3219, I-3222, I-3305, I-3323, I-3350, I-3353, I-3356, I-3357, I-3359, I-3361, I-3379

**RG 4 Comment:** It is not BLM's duty to maximize livestock production to suit permitees rather, BLM must engage in 1) balancing of competing resource values, with some land being used for less than all the resources; 2) management of resources without permanent impairment of the productivity of the land and quality of the environment; 3) prevention of undue or unnecessary degradation of the land.

Comment Letter: O-0008

**RG 5 Comment:** Current grazing practices are not allowing the land to recover. You must address this issue by doing a capability, suitability and forage capacity analysis for the Resource Area using science-based criteria - \*\*see pgs 1-2 for list of criteria \*\*See letter for data concerning the relationship between precipitation, livestock and forage.

**RG 6 Comment:** In popular recreational areas, grazing allotment plans should limit AUMs, areas of use, and closely monitor resource conditions so that low-impact recreational uses are not impaired.

Comment Letter: O-0012

**RG 7 Comment:** The BLM should consider adjusting grazing allotment boundaries or require the modification of grazing management practices where established or future public recreational uses are present, and where such grazing practices may negatively impair the experience of such recreational uses.

Comment Letter: O-0012, O-0016

**RG 8 Comment:** Appendix B of the Guidance Document for the GSENM (CD) presents a new model for calculating the forage that can be allocated to livestock while still allowing for the ecological needs of the land to be met.

Comment Letter: O-0017

**RG 9 Comment:** Utilization levels of 50% will cause significant damage to ecosystem values in the arid West is bourn out by the range science literature. \*\*\*See CD for further detail.

Comment Letter: O-0017

**RG 10 Comment:** \*\*\*See pg. 16 for additional data needed in order to design and defend the proposed grazing program.

Comment Letter: O-0017

**RG 11 Comment:** 3 alternatives should be analyzed in the RMP revisions. 1) Would analyze current management practices, and 2) would analyze predicted conditions if no grazing regime were se in place. 3) The "Rangeland Health Alternative" would address the need to restore and maintain the health and productivity of rangelands in the Moab/Monticello area. \*\*\*\*See pg. 17-22 for more detailed info about alternatives.

Comment Letter: O-0017

**RG 12 Comment:** For allotments failing to meet the standards, the BLM should eliminate grazing in the growing season and further limit grazing in other seasons to a level that does not slow progress of the allotments toward meeting rangeland health standards during the permit period (typically 10 years).

Comment Letter: O-0017

**RG 13 Comment:** Eliminate all domestic sheep allotments within the planning areas. Specifically, FNAWS requests the conversion of the Floy Creek and Crescent Junction allotments from domestic sheep to cattle.

**RG 14 Comment:** Additionally, FNAWS asks the BLM to incorporate within the RMP plans to convert the remaining allotments east of Crescent Junction to the Colorado border, as opportunities arise.

Comment Letter: O-0018

**RG 15 Comment:** FNWAS further requests the BLM to specifically protect big horn sheep in the Rattlesnake herd, Professor Valley herd, Potash herd, North San Juan herd, and the Dolores Triangle herd.

Comment Letter: O-0018

**RG 16 Comment:** All rangelands should undergo a rangeland assessment per the Interpreting Indicators of Rangeland Health-technical reference 1734-6 2000.

Comment Letter: O-0022

**RG 17 Comment:** The RMP should identify allotments suitable for reallocation to non-livestock use based on consideration of wildlife and other resource concerns.

Comment Letter: O-0022

**RG 18 Comment:** All riparian systems should be evaluated for Proper Functioning Condition according to the latest methodology. Where streams are not a properly functioning condition as a result of livestock grazing, ranchers should be held accountable for removing their cattle while BLM and ranchers' work to actively restore all stream reaches to properly functioning condition. Then all livestock should be managed in such a way as to maintain proper functioning condition.

Comment Letter: O-0022

**RG 19 Comment:** The RMP should allow for extended periods (beyond three years) of non-use for conservation purposes at the discretion of the allotment user.

Comment Letter: O-0022

**RG 20 Comment:** Lowering permit numbers to more realistic levels would be a significant step in this direction with benefits for the land and American people, including stabilizing ranching operations as levels that would not have to vary so widely with changes in climate.

Comment Letter: O-0027

**RG 21 Comment:** BLM should accelerate restoration and improvement of public rangelands to properly functioning conditions based on the ability to achieve this goal under severe drought conditions.

**RG 22 Comment:** Base property size needs to be on a sliding scale according to herd size. If the base property is not large enough for the numbers on the allotment, the permitted numbers should be reduced accordingly.

Comment Letter: O-0027

**RG 23 Comment:** There should be a process, consistent with NEPA FLPMA and the Taylor Grazing Act through which an area can be determined to be "not chiefly valuable" for grazing and therefore removed from the grazing district and no longer eligible for grazing use.

Comment Letter: O-0027

**RG 24 Comment:** BLM needs to either hire more field staff, or to subcontract out the work to an experienced and licensed team. The records are simply not available, either to guide the agency or inform the interested public.

Comment Letter: O-0027

**RG 25 Comment:** Monitoring should use the best range science and be consistently applied, done annually, and have immediate consequences for the number of cows on the allotment.

Comment Letter: O-0027

**RG 26 Comment:** With the lands so degraded form years of use and drought, the Grand Canyon Trust recommends BLM have a procedure for quickly retiring cows from allotments that have been abused or in cases where permits have been persuaded to relinquish their grazing privileges through private transactions.

Comment Letter: O-0027

**RG 27 Comment:** Riparian areas that are "functioning at risk" or " not functioning" should have livestock removed.

Comment Letter: O-0027

**RG 28 Comment:** Economic comparison of the benefits of livestock and wildlife to local communities may suggest wildlife and hunting bring in more money to the community.

Comment Letter: O-0027

**RG 29 Comment:** USA-ALL recommends the BLM supplement the information on their website so that the general public may understand the issue, controversy and the range of alternatives that will be studied, a description of how Rangeland Management relates to livestock grazing as well as other activities and discussions.

Comment Letter: O-0029a

**RG 30 Comment:** We strongly encourage the BLM to consider the holistic approach to the range management. This has been proven effective to maintain the range land standards and while allowing ranchers to maintain economically viable livestock grazing operations.

Comment Letter: O-0029a

**RG 31 Comment:** USA-ALL encourages BLM to sign the Cooperative Rangeland Monitoring Program Assessment with the National Public Lands Council and the National Cattlemen's Beef Association.

Comment Letter: O-0029a

**RG 32 Comment:** the RMP should address a more streamlined process for approving the construction of new ponds for stock watering.

Comment Letter: O-0029a

**RG 33 Comment:** Limit domestic livestock grazing.

Comment Letter: I-2213, I-2266, I-2284, I-2374, I-2403, I-2406, I-2630, I-2644, I-2684, I-2694, I-2705, I-2761, I-2777, I-2786, I-2825, I-2830, I-2876, I-3138, I-3203, I-3215, I-3252, I-3335 to I-3338, I-3342, I-3347, I-3360, I-3377, I-3378

**RG 34 Comment:** Require that all grazing allotments be in good or excellent condition – fair and poor condition allotments should be closed for recovery.

Comment Letter: I-2354, I-2367, I-2529, I-2570, I-2602, I-3012, I-3015, I-3097, I-3141, I-3145, I-3152, I-3172, I-3225, I-3293, I-3301, I-3341, I-3344, I-3361

**RG 35 Comment:** Maintain grazing for more cows and wildlife.

Comment Letter: I-2210, I-2339

## Recreation

**REC 1 Comment:** The following principles are suggestions to be considered when designing new trails:

- 1) We advocate a designated only road and trail system for Grand and San Juan counties, with non-motorized trails designated as such
- 2) We support the list of trails developed over the last two years by the County sponsored
   Trail Mix Committee
- 3) Where there are user conflicts, fairly allocate routes between the various user groups
- 4) Designate and mark the most practical road and trail system necessary to meet user needs, thus eliminating "road spaghetti"

- 5) There are areas of neighborhood concern that service the local pet walkers, bicyclists and joggers and should be recognized and signed appropriately
- 6) Use natural barriers wherever possible to delineate trails and to block undesirable spur routes and tracks.
- To Designate roads and trails out of creeks, wetlands, riparian areas and other sensitive fragile areas.

Comment Letter: O-0011

**REC 2 Comment:** \*\*\*\*See O-11 for list of trails

Comment Letter: O-0011

**REC 3 Comment:** RMP revisions should state the significance of SE Utah as a recreation resource and identify management actions to preserve the area's unique rec values

Comment Letter: O-0012

**REC 4 Comment:** RMP should develop a travel plan that restricts motorized travel to designated roads and trails. There should be no open x-country areas. All routes are considered closed, unless signed as open.

Comment Letter: O-0022

**REC 5 Comment:** Within the zone of heavy use around Moab, approximately a 30-mile radius, the travel plan should ensure that all areas are closed to vehicle supported camping unless designated as open

Comment Letter: G-0015, O-0022

**REC 6 Comment:** Within the zone of heavy use around Moab, there should be no gathering of wood

Comment Letter: O-0022

**REC 7 Comment:** All mountain bikes should be treated as motorized vehicles and be restricted to designated roads and trails as defined in the travel plan.

Comment Letter: O-0022

**REC 8 Comment:** No campgrounds should be constructed in important habitat for special designation species or other species of concern.

**REC 9 Comment:** All vehicle supported campers and day users should be required to use constructed toilets or pack out their human waste.

Comment Letter: O-0022

**REC 10 Comment:** Climbing routes that are disturbing nesting birds of prey should be closed seasonally or permanently.

Comment Letter: O-0022

**REC 11 Comment:** Base jumping should only be allowed in designated areas

Comment Letter: O-0022

**REC 12 Comment:** The BLM must manage the lands under a "recreation opportunity spectrum" or ROS. These designations allow for multiple activities.

Comment Letter: O-0022, O-0031

**REC 13 Comment:** An alternative that maximized recreation opportunity should be developed

Comment Letter: O-0024, O-0031

**REC 14 Comment:** Mechanized travel such as the use of bicycles should be limited to designated routes, x country travel should be prohibited. Increased non-motorized recreation ultimately creates the same kinds of harmful surface disturbance that motorized use does and should be monitored

Comment Letter: O-0027

**REC 15 Comment:** BLM should incorporate a vigorous recreational education program into all management alternatives

Comment Letter: O-0029a

**REC 16 Comment:** Recreation Opportunity Spectrum (ROS) should be available for public view and comment prior to the release of any draft alternatives

Comment Letter: O-0029a

**REC 17 Comment:** The county is not interested more de facto wilderness such as large Areas of Critical Environment Concern (ACECs). We want developed recreational opportunities, which of course would require facilities from which to launch backpacking and biking activities as well. Special designations don't have to be part of this. Rather good promotional plans do.

**REC 18 Comment:** We would suggest that important park viewsheds be identified in the RMPs, and that land uses be managed to maintain the quality of these views, including minimizing and shielding night lighting.

Comment Letter: G-0004

**REC 19 Comment:** It is Uintah County's concern that lands not be closed to multiple use and restricted to only single use, and particularly to only specialized use within a single use designation.

Comment Letter: G-0017

**REC 20 Comment:** Institute fees for all who use of-road areas.

Comment Letter: G-0020, I-2256, I-3029, I-3075, I-3125

**REC 21 Comment:** Install small pit toilets in areas to eliminate cat holes.

Comment Letter: I-2353, I-2684, I-3108, I-3127, I-3135

**REC 22 Comment:** Route inventory info should include difficulty levels for all uses.

Comment Letter: I-2250, I-2353, I-2905

## **Special Designations**

**SD 1 Comment:** WSR- \*\*\*see G-2 for list of trust land which the potentially eligible wild and scenic rivers or river segments pass. Trust lands that lie within the suggested on-quarter mile river corridor are not listed but the impact of their presence should also be considered in the draft resource management plan analysis.

Comment Letter: G-0002, I-0001 to I-0898, I-0901 to I-1276

**SD 2 Comment:** WSR-In Natural Bridges National Monument, White Canyon Creek and its tributary, Armstrong Canyon Creek, were found both eligible and suitable for the NWSR in the "wild" classification.

Comment Letter: G-0004

**SD 3 Comment:** WSR-In Arches and Canyonlands NPs, eligibility studies, but not suitability studies have been conducted. \*Refer to letter G-0004 to view segments that have been determined eligible.

**SD 4 Comment:** While a wild and scenic river program may have some merit in some regions of the country where growth and development may impair remaining vestiges of free-flowing rivers and, most importantly, where state and local governments concur in the designation, this program has little if any merit in the "public land" West where development is already vigorously controlled and even prohibited by federal policy.

Comment Letter: G-0011

**SD 5 Comment:** The Council has chosen a "non-support" response to the following river segments and their outstandingly remarkable values and tentative classifications \* See G-13 for list of river segments.

Comment Letter: G-0013

**SD 6 Comment:** Uintah County is opposed to the designation of WSR on waters within Uintah County or waters that will have an impact on Uintah County.

Comment Letter: G-0017

**SD 7 Comment:** ACECs prohibit the use of the land and eliminate possible economic development.

Comment Letter: G-0020

**SD 8 Comment:** If Wild and Scenic designation takes place, these areas should be classified as VRM Class.

Comment Letter: O-0027

**SD 9 Comment:** \*\*\*See O-27 for list of suggested changes to WSR Draft Eligibility Determination.

Comment Letter: O-0027

**SD 10 Comment:** \*\*\*See 0-27 for a list of prescriptions for the proposed Castle Valley ACEC.

Comment Letter: O-0027

**SD 11 Comment:** BLM must not use a "Zone Management" concept to establish de-facto Wilderness or Wilderness Study Areas or to remote areas from multiple use/sustained yield management.

Comment Letter: O-0029a

**SD 12 Comment:** SUWA submits these wilderness proposals during the Monticello FO RMP process so that the planning process can adequately incorporate this new info into the RMP. \*\*\*See appendix A of SUWA.

**SD 13 Comment:** Designation of riparian areas and wetlands as ACECs.

Comment Letter: O-0031

**SD 14 Comment:** Designations of ACECs will supervise all travel designations including specific vehicle route designations.

Comment Letter: O-0031

**SD 15 Comment:** Do not designate Wild and Scenic Rivers.

Comment Letter: I-3324

**SD 16 Comment:** Where wilderness characteristics occur, protect form motorized traffic mineral extraction, and development. Keep current specially designated lands.

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Comment Letter: I-2196, I-2197, I-2204, I-2205, I-2207, I-2208, I-2216, I-2218, I-2227, I-2229, I-2232, I-2238, I-2270, I-2275, I-2277, I-2279 to I-2281, I-2286, I-2290, I-2292, I-2311, I-2316, I-2321, I-2326, I-2327, I-2343, I-2493, I-2495, I-2498, I-2501, I-2518, I-2522, I-2570, I-2571, -2627, I-2643, I-2696, I-2728, I-2784, I-2838, I-2847, I-2876, I-2892, I-2911, I-2914, I-2944, I-2953, I-2976, I-2977, I-2987 to I-2989, I-2995, I-2998, I-3003, I-3006, I-3007, I-3012, I-3013, I-3015, I-3022, I-3042, I-3051, I-3070, I-3093, I-3127, I-3146, I-3152, I-3161, I-3162, I-3177, I-3190, I-3196, I-3197, I-3200, I-3245, I-3247, I-3251, I-3287, I-3299 to I-3301, I-3305, I-3308, I-3309, I-3312, I-3314, I-3315, I-318, I-3323, I-3337, I-3349a to I-3349e, I-3349h, I-3349, I-3372 to I-3376, I-3380, I-3381, I-3383
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**SD 17 Comment:** Backcountry Management Areas – Need to be defined and revealed to the public for clearer understanding and public input. Until then, not supported.

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Comment Letter: I-2364, I-2365, I-2538, I-2540, I-2613, I-2617, I-2620, I-2628, I-2663, I-2698, I-2736, I-2766, I-2770, I-2775, I-2779, I-2802, I-2817, I-2829, I-2840, I-2875, I-2880, I-2886, I-2889, I-2901, I-2904, I-2923, I-2943, I-2970, I-2978, I-3066, I-3073, I-3093, I-3103, I-3109, I-3113, I-3121, I-3130, I-3147, I-3214, I-3218, I-32223, I-3316, I-3330 to I-3332, I-3358, I-3359, I-33361
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**SD 18 Comment:** Abandon special designations for wilderness areas.

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Comment Letter: I-2200, I-2335, I-2504, I-2520, I-2538, I-2737, I-2775, I-2840, I-2889, I-2904, I-2923, I-2985, I-2966, I-2970, I-3001, I-3016, I-3018, I-3043, I-3054, I-3102, I-3199, I-3227, I-3313, I-3382, I-3255
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## **Threatened and Endangered Species**

**TES 1 Comment:** BLM should support any conclusions on the impacts of livestock grazing on habitat function for species at risk with existing scientific analysis

**TES 2 Comment:** The DEIS and revised RMP needs to establish utilization levels that will consistently allow the rangelands in the Moab/Monticello Field Offices to achieve and continue to meet the Standards and Guidelines for Rangeland Health.

Comment Letter: O-0017

**TES 3 Comment:** '03- The conservancy would like to see primacy given to protection of Endangered, threatened and Sensitive species where they may be adversely affected by other land uses.

Comment Letter: O-0022

## **Transportation**

**TR 1 Comment:** Airstrips represent already disturbed areas. In some cases, major cut and fill techniques were used during construction. To maintain them to minimal standards, the UBCP would suggest a five-point program brush removal, surface grading, seeding, windsock, and advisory signs.

Comment Letter: O-009

**TR 2 Comment:** \*\*\*\*\*See O-16 for complete Transportation Plan.

Comment Letter: O-0016, I-1277 to I-1436, I-1438 to I-2157

**TR 3 Comment:** BLM should obtain the results of the studies done for the National Park Service in Salt Creek Canyon where the closure of a jeep route has led to a dramatic resurgence of natural vegetations and wildlife.

Comment Letter: O-0023

**TR 4 Comment:** We ask BLM to include in the RMP a comprehensive plan for routes of travel, addressing all modes. BLM should close motor routes that are not needed for public purposes identified in the plan.

Comment Letter: O-0023, O-0027

**TR 5 Comment:** Regardless of pending litigation or negotiations over RS2477 assertions, BLM must find a way of dealing with this issue that is consistent, or at least not inconsistent, with applicable law and which does not force the counties or other public land users into adversarial positions and expensive litigation.

Comment Letter: O-0029a

**TR 6 Comment:** This should not allow alternatives to be developed that purports to close or limit the use of 2477 assertions.

Comment Letter: O-0029a

**TR 7 Comment:** Any attempt to formulate a "travel limited to designated roads and trails" regime must include EVERY road and trail asserted as a 2477.

Comment Letter: O-0029a

**TR 8 Comment:** Travel planning and effective management of motorized use is the key issue in this planning area. We encourage the BLM to develop a travel plan as part of this RMP.

Comment Letter: O-0031

**TR 9 Comment:** A comprehensive travel plan, which allows for both motorized and non motorized travel, should be completed concurrently with, and adopted by the RMP. The plan should designate specific trails for ORVs, mountain bikes, hikers, and equestrian users, etc.

Comment Letter: O-0031, I-2185, I-2193, I-2202, I-2209, I-2185, I-2226, I-2236, I-2247, I-2266, I-2273, I-2277, I-2285, I-2286, I-2291 to I-2293, I-2321, I-2336, I-2354, I-2390, I-2400, I-2522, I-2644, I-204, I-2761, I-2777, I-2840, I-2847, I-2876, I-2889, I-2904, I-2984, I-2998, I-3022, I-3034, I-3064, I-3148, I-3163, I-3197, I-3202 to I-3204, I-3210, I-3220, I-3222, I-3264, I-3288, I-3292, I-3335, I-3338, I-3349, I-3350, I-3353, I-3356, I-3357, I-3359, I-3380

**TR 10 Comment:** The RMP travel plan should include the subcomponent of an enforcement plan, with sufficient FO budgeting.

Comment Letter: O-0031

**TR 11 Comment:** After designation of trails, clearly mark trails so that all users will be aware of where ORV use is, and is not appropriate and prohibit ORV use unless routes are specifically marked and designated as available for the use.

Comment Letter: O-0031

**TR 12 Comment:** Implement effective, frequent monitoring of ORV impacts, and set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs sanctioned by the RMP.

Comment Letter: O-0031

**TR 13 Comment:** Restrict ORVs from WSAs, from critical wildlife habitat, and riparian and wetland areas.

**TR 14 Comment:** No unrestricted, cross-country use in the Monticello area.

Comment Letter: O-0031

**TR 15 Comment:** Keep "Mineral Bottom" airstrip open o small aircraft.

Comment Letter: I-3108

**TR 16 Comment:** Designate some trails as non-motorized/non-mechanized. (Seven mile Canyon Area).

Comment Letter: I-2192, I-245, I-2281, I-2400, I-2445, I-2501, I-2503, I-2563, I-2578, I-2617, I-2675, I-2763, I-2891, I-2938, I-2991, I-3003, I-3010, I-3013, I-3038, I-3128, I-3144, I-3162, I-3170, I-3190, I-3201, I-3223, I-3245, I-3298, I-3308

**TR 17 Comment:** Reduce overall road/route density to reduce habitat fragmentation.

Comment Letter: I-2239

**TR 18 Comment:** Current maps need to be more accurate.

Comment Letter: I-2195, I-2359, I-2722, I-2737, I-2747, I-2888, I-3199, I-3233

### Vegetation

**VEG 1 Comment:** We would encourage BLM to consider expanding your program for exotic species control.

Comment Letter: G-0004

**VEG 2 Comment:** Recent burn areas, such as the Goose Island area along the Colorado River, may offer some potential for restoration with continuing treatment.

Comment Letter: G-0004

**VEG 3 Comment:** All land uses proposed in the plan must present strategies that limit growth of invasive plants.

Comment Letter: G-0005

**VEG 4 Comment:** There is no basis in law for developing "vegetation management objectives". The criteria should state, "Utilizing the principle of multiple use, formulate and consider reasonable alternatives" and should quote extensively form FLPMA section 202c

Comment Letter: O-029a

**VEG 5 Comment:** If BLM does not rescind the criteria, BLM should immediately provide a definition of "vegetation management objective" in all planning documents

Comment Letter: O-029a

**VEG 6 Comment:** Criteria should be developed publicly and open for early public comment and review

Comment Letter: O-029a

**VEG 7 Comment:** Surface-disturbing activities must not be allowed in threatened, endangered or sensitive plant species habitat.

Comment Letter: O-0031

**VEG 8 Comment:** These areas must be targeted for noxious weed control activities.

Comment Letter: O-0031

**VEG 9 Comment:** Areas with threatened, endangered, or sensitive plants must be excluded from fuel wood cutting areas.

Comment Letter: O-0010

**VEG 10 Comment:** BLM must review grazing allotments and address the protection of areas with threatened, endangered, or sensitive plant species.

Comment Letter: O-0031

**VEG 11 Comment:** Communication sites, utility ROWs and road ROWs must not be permitted in known special status species populations

Comment Letter: O-0031

**VEG 12 Comment:** Reseeding or surface disturbing restoration after fires must not be allowed in areas with special status plant species, as the natural diversity and vegetation structure must be allowed to provide regeneration.

Comment Letter: 0031

**VEG 13 Comment:** BLM must survey the planning area to document all "relict plant" communities-areas that have persisted despite the warming and drying of the interior west.

**VEG 14 Comment:** Relic and hanging gardens must be managed from their complete protection; surface disturbing or other activities that could affect these communities must not be allowed.

Comment Letter: O-0031

**VEG 15 Comment:** BLM must prohibit methods and projects that do no achieve restoration or that irreversibly impact other resources in the planning area.

Comment Letter: O-0031

**VEG 16 Comment:** Chaining, roller chopping, or similar methods must be prohibited.

Comment Letter: O-0031

**VEG 17 Comment:** Livestock must be excluded roam restoration/re-vegetation site for enough time to document that the restoration is successful and that there will be no impact from livestock grazing in the area.

Comment Letter: O-0031

**VEG 18 Comment:** Although control of noxious weed species is a priority, chemical treatments of noxious weed species should be used only if damage to other resources is the area is significant, imminent and certain, and then only with specific application.

Comment Letter: O-0031

**VEG 19 Comment:** BLM must prioritize areas for which fire could improve the vegetation communities and then allow natural fires to burn in these areas.

Comment Letter: O-0031

**VEG 20 Comment:** BLM must establish monitoring plots to determine the effectiveness for the treatments used for invasive plant control and to provide baseline data of overall change in conditions

Comment Letter: O-0031

**VEG 21 Comment:** Fuel-wood harvesting must not be allowed outside of already disturbed areas.

### Water

**WR 1 Comment:** The land use plan must address management of these areas and outline steps needed to improve their overall condition.

Comment Letter: G-0005

**WR 2 Comment:** Watershed management practices are important and should control vegetation that decreases or impairs long-term water quality or quantity to avoid jeopardy to Utah State water rights.

Comment Letter: G-0009

**WR 3 Comment:** BLM held water rights that may no longer be needed fro grazing could be converted to use by wildlife after an appropriate proceeding to change the office of the state engineer.

Comment Letter: O-0027

**WR 4 Comment:** Any minerals development projects proposed fro critical water shed areas should go through NEPA process and only be permitted if it can be shown that no impairment of the water resource (quality or quantity) will occur with the development.

Comment Letter: O-0027

**WR 5 Comment:** - Water quality monitoring should be implemented when ground disturbing activities could adversely affect the resource and mitigation should be required in that case

Comment Letter: O-0027

**WR 6 Comment:** - New recreation facilities should be prohibited in riparian areas except for small signs for resource protection.

Comment Letter: O-027

**WR 7 Comment:** Livestock should be removed from riparian areas. Impacts to riparian areas by livestock include stream-bank erosion, disturbance of biological soil crusts, water quality degradation from small wastes and silting, transportation of weed seeds, vegetation removed and vegetative associations altered.

Comment Letter: O-0027

**WR 8 Comment:** If water developments are constructed such as troughs, pumps, pipelines, impoundments, in order to remove livestock from riparian areas, construction should not cause reduced flow rates of the water source or dewatering of springs. Water developments should not be permitted to increase overall livestock numbers.

**WR 9 Comment:** The cornerstone to effective protection of riparian areas is the completion of a comprehensive inventory of the riparian and wetlands resources within the bounds of the RMP area.

Comment Letter: O-0031

**WR 10 Comment:** Exclusion of off-road vehicles form riparian areas and wetlands, or lands outside of such areas where vehicle use may impact such areas.

Comment Letter: O-0031

**WR 11 Comment:** Incorporation of riparian and wetland area protection of the associated watersheds.

Comment Letter: O-0031

**WR 12 Comment:** Exclusion of cattle and sheep from riparian and wetland areas, or lands outside of such areas where domestic grazing may impact such areas.

Comment Letter: O-0031

**WR 13 Comment:** Development of an effective monitoring program that would measure biodiversity and wildlife populations.

Comment Letter: O-0031

**WR 14 Comment:** An explanation of how mineral development and associated impacts such as waste pits, roads, pipelines and other uses, will be regulated so as to avoid impacts to riparian areas and wetlands.

Comment Letter: O-0027

**WR 15 Comment:** A prohibition on the issuance of ROW in riparian and wetlands areas, or in lands outside of such areas where ROW use would adversely impact riparian areas.

Comment Letter: O-0027

**WR 16 Comment:** Identify for acquisition lands in private, state or local government ownership within riparian or wetland areas that are ecologically, hydrologically, or geologically linked to BLM wetlands.

#### **Wilderness**

**WDNS 1 Comment:** BLM should emphasize the importance of wilderness values and manage areas with such qualities to maintain these values.

Comment Letter: O-0012

**WDNS 2 Comment:** The BLM should ensure the maintenance of roadless areas within the SE Utah RMP areas so these areas may, if appropriate, become designated as wilderness areas by statute.

Comment Letter: O-0012

**WDNS 3 Comment:** To comply with NEPA, which requires a reasonable range of alternatives, we believe the alternatives in the draft plan and EIS must include consideration for WSA status of all the lands found to have wilderness characteristics by BLM in any of its wilderness inventories, or proposed for wilderness by members of Congress in America's Redrock Wilderness Act.

Comment Letter: O-0023

**WDNS 4 Comment:** BLM must make all "new information regarding wilderness characteristics" available for public review and comment prior to utilizing such information to develop draft alternatives.

Comment Letter: O-0029a

**WDNS 5 Comment:** BLM should supplement with an inventory of other resource values and uses in each "wilderness inventory unit" that inventory should include, but not be limited to, inventory of motorized and mechanized recreational values and opportunities, inventory of landing strips, inventory of rangeland improvements (stock ponds, fences, cattle guards, etc) and inventory of lands with MD potential.

Comment Letter: O-0029a

### Wildlife

WI 1 Comment: We would encourage that management of important habitat near NPS units consider wildlife values.

Comment Letter: G-0004

**WI 2 Comment:** We would support the inclusion of provisions for bighorn sheep conservation in the rew RMP.

**WI 3 Comment:** It is critical that the RMP incorporate adopted sage grouse guidelines that were developed by the Western Association of Wildlife Agencies and published in the Wildlife Society Bulletin (28:967-985). The plan must clearly demonstrate how these guidelines are to be incorporated.

Comment Letter: G-0005

**WI 4 Comment:** It is absolutely essential that the historic Mule Deer migration corridors are protected. The land use plan should acknowledge and accommodate these needs.

Comment Letter: G-0005

**WI 5 Comment:** RMP must recognize the Utah Dept of Wildlife's responsibility to manage wildlife on BLM-managed lands.

Comment Letter: O-0029a

**WI 6 Comment:** Utah FNAWS requests the BLM to specifically protect bighorn sheep herds in the following areas within these two RMP areas: Rattlesnake herd, Professor Valley herd, Potash herd, North San Juan Herd, South San Juan herd, and the Dolores Triangle herd-managed in conjunction w/ the Colorado DOW.

Comment Letter: O-0001

**WI 7 Comment:** The BLM should place a priority on protecting riparian and water resources as they relate to fish and wildlife. They should preserve the integrity of wildlife corridors; migration routes and access to key forage, nesting and spawning areas by limiting adverse impacts form any type of development in the Moab/Monticello Field Offices.

Comment Letter: O-0027

**WI 8 Comment:** BLM should work in conjunctions with the Utah Division of Wildlife Resources to achieve and maintain healthy and natural population distributions of wildlife.

Comment Letter: O-0027

**WI 9 Comment:** The BLM should implement seasonal restrictions on visitor use and extractive uses to protect critical habitat, breeding and fawning

# Moab & Monticello Resource Management Plan Public Scoping Comments May 2004

#### Monticello

#### **Air Quality**

**AQ 1 Comment:** The air quality in Moab and Monticello FO's should be managed as PSD Class 1 areas, if not, BLM mangement practices should not degrade the PSD Class I status of the adjacent NPs.

Comment Letter: O-0005

**AQ 2 Comment:** Site specific project proposals including special events should be reviewed for compliance with existing air quality laws and policies.

Comment Letter: O-0005

**AQ 3 Comment:** Mitigation measures should be incorporated into project proposals to reduce air quality degredation.

Comment Letter: O-0005

**AQ 4 Comment:** BLM should take a proactive approach to managing air quality by, among other things:gathering baseline data, setting aggressive standards, requiring any actions on public lands to meet those standards, analyzing the cumulative impact of any proposed actions on all lands boht within the Resource Area and all areas that contribute air pollutants, establish an effective air quality monitoring program, and halt any actions that contribute to air pollution if such monitoring reveals that standards have been exceeded.

Comment Letter: O-0027

**AQ 5 Comment:** The BLM needs to consider and monitor for the potential air quality impacts to Class I air sheds, such as adjacent Canyonlands National Park and Dark Canyon Wilderness Area.

Comment Letter: O-0027

**AQ 6 Comment:** Any commercial or private uses on BLM lands should be allowed only with maximum air quality standards included in the agreement & significant penalties specified for non-compliance.

### **Cultural Resources**

**CR 1 Comment:** Hovenweep National Mounment is currently in the process of develping a General Management Plan. There may be opportunities for cooperation in the management of Hovenweep and related archeological sites on nearby BLM lands.

Comment Letter: G-0001

**CR 2 Comment:** Because of relationship of the Hovenweep sites to those on BLM lands, there may be a need for special stipulations and/or designations such as ACEC's on BLM lands in the vicinity of Hovenweep.

Comment Letter: G-0001

**CR 3 Comment:** We oppose BLM Instruction Memorandum 98-132-2, which prohibit reburial of Native American human remains excavated from BLM land and subject to NAGPRA on BLM land.

Comment Letter: G-0004, I-2682

**CR 4 Comment:** Research and statements from several of our elderly have indicated that our people had traveled in those areas whether hunting, trading or for other reasons. Since you have identified cultural sites in your letter, we feel that special attention be taken to preserve them.

Comment Letter: G-0012

**CR 5 Comment:** It would be good to have a fence or even signs nearby asking people to please respect this lost art.

Comment Letter: G-0017

**CR 6 Comment:** It would be a good idea if we could have a list of the plants in that area then we could identify what they are used for, so that it may help in the resource values.

Comment Letter: G-0017

**CR 7 Comment:** BLM should increase public education and appreciation of archaeological resources through interpretation of sites that are easily accessible and therefore vulnerable to damage.

Comment Letter: O-0005, I-2213, I-2380, I-2682

**CR 8 Comment:** Cultural surveys in high use areas, such as along trails and open routes should be prioritized to ensure protection of vulnerable resources.

Comment Letter: O-0005, I-2445

**CR 9 Comment:** Where vulnerable sites exist in the backcountry and there are no available resources for monitoring or protection the BLM should not disclose or identify locations or encourae visitation or extractive uses in these areas.

Comment Letter: O-0005

**CR 10 Comment:** There should be periodic law enforcement monitoring of vulnerable backcountry cultural resources, year round.

Comment Letter: O-0005, I-2265, I-2293, I-2470

**CR 11 Comment:** Protecting, preserving and maintaining the integrity of cultural and historic resources in the Monticello field area should be BLMs paramount management objective.

Comment Letter: O-0011a, I-2283, I-2407

**CR 12 Comment:** Proactive inventories, monitoring, and National Register evaluations under Section 110 of NHP should be an essential component of BLMs management objectives.

Comment Letter: O-0011a

**CR 13 Comment:** Digital Vandalism-promote awareness regarding the advere effects associated with "digital vandalism"; amend current recreation permits and restrict the approval of future recreation permits in areas that have sensitive, undocumented, and/or unevaluated cultural resource sites.

Comment Letter: O-0011a

**CR 14 Comment:** The use of the term "sacred waterways" is inappropriate and should be revised.

Comment Letter: O-0013

**CR 15 Comment:** The RMP should make cultural resources a high priority, and should include plans for increasing the inventory of cultural resources, improving the quality of information about known sites, supporting appropriate research activities, and improving public education.

Comment Letter: B-0002

**CR 16 Comment:** RMP must fully integrate resources into the planning process.

Comment Letter: B-0002

**CR 17 Comment:** RMP should identify a quality control process for the site file data, including at least reasonable attempts to quantify the problems in the data.

**CR 18 Comment:** The RMP needs to detail a plan for dealing with these road/site conflicts, first by identifying them, then by closing or moving roads, or mitigating the adverse effects that are occurring.

Comment Letter: B-0002, I-2433

**CR 19 Comment:** Increased vandalism is a reasonable forseeable effect of such development, and the resource mangement plan should establish procedures for dealing with these effects through the sec. 106 process.

Comment Letter: B-0002

**CR 20 Comment:** Inventories should occur early in the planning process, before specific locations are selected for leasing, so that archaeological site locations can be takine into consideration long before development is proposed.

Comment Letter: B-0002

**CR 21 Comment:** RMP should establish a reasonable schedule for nominating these priorities to the national register, and then the BLM must commit the resources to make sure the plan is actually followed.

Comment Letter: B-0002

**CR 22 Comment:** Propose an ACEC encompassing the entire areas of the currently designated Cedar Mesa and Alkali Ridge ACECs, as well as other BLM lands in T 35-40 S, R 20-26 E, between Comb Wash and Colorado State Line. It is important to give these archaeological sites the protection they deserve.

Comment Letter: B-0002

**CR 23 Comment:** We request that the BLM Field Office prepare or contract for the preparation of an up to date Class I Overview of the cultural resources of the Field Office to accompany the environmental impact assessment.

Comment Letter: O-0025

**CR 24 Comment:** As the Field Office proceeds to develp the scope of work for htis Class I Overview, we would like to see that the scope of work and the resource management plan are written to fulfill the BLM's compliance responsibilities with section 110 of the National Historic Preservation Act, as well as its Section 106 responsibilities.

**CR 25 Comment:** Preparation of updated historic property evaluations would then serve as the guide for the cultural resource use allocations specified in the Information Bulletin and in all BLM resource management plans.

Comment Letter: O-0025

**CR 26 Comment:** We also suggest that as alternatives are dvelped for hte resource management plan and environmental impact statement, that specific consideration be given to the develpment of section 106 guidance for hte Field Office.

Comment Letter: O-0025

**CR 27 Comment:** We would like to see specific information tabulated on the relationships between site types and the distribution of size and shapes of areas of potential effect based on undertaking types.

Comment Letter: O-0025

**CR 28 Comment:** We also recommend that with preparation of the environmental impact statement and the public outreach and consultation efforts underway, it would be timely for the Field Office to update their inventory of cultural items as defined under NAGPRA.

Comment Letter: O-0025

**CR 29 Comment:** The RMP process should identify broad areas where cultural sites ae at risk and employ one or more of these administrative measuresto protect these resources.

Comment Letter: O-0027

**CR 30 Comment:** Prior to designation in the RMP, all potential ORV routes must be surveyed for cultural resources; no travel may be permitted until such survey has occurred, and protection from degradation is ensured.

Comment Letter: O-0027, I-2682

**CR 31 Comment:** Keep livestock out of archeological sites.

Comment Letter: I-2284, I-2316, I-2335

**CR 32 Comment:** BLM should revisit the idea of involving volunteers to help monitor sensitive area & popular archeaological sites.

Comment Letter: I-2293, I-2380

**CR 33 Comment:** Keep all significant cultural resources in public land ownership.

**CR 34 Comment:** Work with local and regional Native American groups to determine which areas are sacred or traditional use areas.

Comment Letter: I-2380

**CR 35 Comment:** Develop a grant program to obtain much needed funds to protect, research, stabilize, or interpret these valuable resources.

Comment Letter:I-2380

**CR 36 Comment:** Prosecute for vandalism of cultural resources.

Comment Letter: I-2417, I-2682

**CR 37 Comment:** CR's in SJCO are irreplaceable and should be furnished with increased protection through ACEC stipulations.

Comment Letter: I-2521

**CR 38 Comment:** We suggest the BLM develop a plan of direction for cultural resources that defines what needs to be protected and some direction as to how we expect to benefit from those protected sites. We would like for the BLM to do whatever necessary to protect the most significant sites and stop spending your nickel on those sites that are not going to do anything for cultural interests.

Comment Letter: I-2585

### **Lands & Realty**

**LR 1 Comment:** We suggest the Planning Team consider eliminating "Lands and Realty" as a Planning Issue and addressing the various topics as follows: Utility right-of-way corridors, Land Tenure Adjustments, Wind Energy and other potential renewable energy sites, and Withdrawals.

Comment Letter: O-0013

LR 2 Comment: Like to see the RMP identify lands suitable for acquisition, trade or disposal.

Comment Letter: O-0023

**LR 3 Comment:** Pursue acquisitions of significant part sites on private land.

# **Mineral Development**

**MD 1 Comment:** There are areas near the parks that may need to be managed for no surface occupancy or no leasing.

Comment Letter: G-0001, I-2425

**MD 2 Comment:** BLM must consider all areas with know potential for natural gas and oil as viable lands to be leased for NG&O development, regardless of specific interest in those areas.

Comment Letter: O-0002, I-2248, I-2516, I-2554

**MD 3 Comment:** It is important that future opportunities to explore for and develo natural gas and oil resources not be indiscrimately foreclosed.

Comment Letter: O-0002, I-2371, I-2585

**MD 4 Comment:** BLM must acknowledge that natural gas and oil exploration and development activities are fully compatible with semi-primitive recreational values and opportunities (sensitive areas).

Comment Letter: O-0002, I-2585

**MD 5 Comment:** BLM should not open any areas to leasing unless they have first made a determination that the oil/gas potential of the area outweighs recreational, wilderness, ect.

Comment Letter: O-0003, I-2405, I-2415, I-2465

**MD 6 Comment:** When considering desired future conditions for minerals development, BLM should determine that leasing will only take place when the natural and ecological processes and resiliency are assured.

Comment Letter: O-0005, I-2398, I-2457, I-2571, I-2652

**MD 7** Comment: The BLM should designate as "No Surface Occupancy" for oil gas development all lands proposed for wilderness designation in the America's Redrock Wilderness Act.

Comment Letter: O-0006, I-2204, I-2206, I-2223, I-2254, I-2278, I-2308, I-2335, I-2401, I-2457, I-2500, I-2541, I-2547, I-2581, I-2586, I-2602, I-2659

**MD 8 Comment:** Reasonable measures should be required to minimize adverse impacts to other resource values, land uses or users not addressed in the lease stipulations at the time operations are proposed.

Comment Letter: O-0006, I-2620

**MD 9 Comment:** Close areas designated as ACECs to new leases, or at the very least require "NSO" restrictions throughout all ACECs.

Comment Letter: O-0011a

**MD 10 Comment:** Require compliance with Section 106 of the NHPA prior to the conveyance of any new leases within the Monticello field area. BLM should approve conveyance of new leases only if the leases can be developed in a way that will avoid all potential adverse effects to historic and cultural resources.

Comment Letter: O-0011a, I-2652

**MD 11 Comment:** Proactively terminate leases that are either inactive or are not meeting production requirements.

Comment Letter: O-0011a

**MD 12 Comment:** BLM should ot avoid a no-lease or no-surface occupancy stipulation decision for areas allocated to semi-primitive recreation in all alternatives.

Comment Letter: O-0013

**MD 13 Comment:** Each alternative should support the ability of the Oil and gas industry to travel "cross country" for exploration purposes.

Comment Letter: O-0013

**MD 14 Comment:** BLM must include a detailed review of the Oil and Gas potential identified by the most current USGS Resource Assessment. Information should include, but not limited to "play type", producing formations and theprojected methods for discovery.

Comment Letter: O-0013

**MD 15 Comment:** The BLM should focus on lease stipulation adverse impacts to oil and gas suuply on realistic estimates of economically recoverable resources, not just tehcnially recoverable resources.

Comment Letter: O-0027

**MD 16 Comment:** The BLM should use high range and low range of fuel proces in its economically reoverable analysis for oil and gas.

Comment Letter: O-0027

**MD 17 Comment:** The RMP should address the socio-eco impacts of the boom and bust development cycle associate with oil and gas drilling on surrounding communities.

**MD 18 Comment:** RMP should fully protect the remaining undeveloped lands.

Comment Letter: O-0027, I-2313, I-2383, I-2392

**MD 19 Comment:** Simply because an area is currently leased should not prvent consideration of designations that conflict with oil and gas development.

Comment Letter: O-0027

**MD 20 Comment:** RMP should propose withdrawal of certain areas form mineral entry. These areas would include, but not be limited to lands proposed for wilderness designation, land containing cultural resources, ACECs, important habitat, water resources and unique geologic formations.

Comment Letter: O-0027, I-2257, I-2438

**MD 21 Comment:** At a minimum close all the areas within the Utah wilderness coalitions wilderness proposal to leasing for the purpose of energy exploration.

Comment Letter: I-2163, I-2171, I-2220, I-2437, I-2600, I-2656

MD 22 Comment: Preserve the redrock wilderness, keep oil and gas out.

Comment Letter: I-2164, I-2166, I-2180, I-2186, I-2250, I-2310, I-2318, I-2319, I-2526, I-2590, I-2629

**MD 23 Comment:** BLM should not sell oil & gas leases in areas with high scenic, recreational wilderness, or wildlife values.

*Comment Letter:* I-1297 to I-1302, I-1304 to I-1851, I-1853 to I-1930, I-1932 to I-2007, I-2009 to I-2155, I-2171, I-2227, I-2238, I-2241, I-2246, I-2268, I-2280, I-2287,

I-2294, I-2295, I-2301, I-2303, I-2311, I-2317, I-2319, I-2325, I-2338 to I-2342,

I-2346, I-2354, I-2355, I-2384, I-2403, I-2412 to I-2414, I-2416, I-2419, I-2427,

I-2442, I-2444, I-2459, I-2470, I-2475, I-2478, I-2485, I-2495, I-2504, I-2505,

 $I-2509,\,I-2513,\,I-2518,\,I-2541,\,I-2565,\,I-2566,\,I-2568,\,I-2575,\,I-2578,\,I-2582\ to$ 

I-2584, I-2588 to I-2590, I-2600, I-2603, I-2605, I-2614, I-2615, I-2622, I-2641,

I-2651, I-2662, I-2667, I-2680, I-2682

**MD 24 Comment:** Thumper trucks should be required to use existing roads.

Comment Letter: I-2198

**MD 25 Comment:** Oil and gas companies need to be required to reclaim any area after exploration.

**MD 26 Comment:** Oil & gas development should be closed in the Rock Cliffs.

Comment Letter: I-0001 to I-0744, I-0746 to I-0948, I-0950 to I-0956, I-0958 to I-0994, I-0996 to I-1027, I-1029 to I-1164, I-1166 to I-1197, I-1199 to I-1257, I-1259 to I-1296, I-2237, I-2254, I-2261, I-2288, I-2299, I-2302, I-2362, I-2365, I-2372, I-2401, I-2484, I-2491, I-2503, I-2510, I-2532, I-2539, I-2545, I-2547, I-2569, I-2594, I-2597, I-2602, I-2612, I-2627, I-2629, I-2634, I-2651, I-2659

**MD 27 Comment:** Long term benefits of recreation outweitgh the short term gains of mining and drilling.

Comment Letter: I-2491

**MD 28 Comment:** Withdrawal mining claims that are inactive, or in violation of BLM mining laws.

Comment Letter: I-2457

**MD 29 Comment:** No mining or oil extraction.

Comment Letter: I-2457

**MD 30 Comment:** Where areas already have exisiting infrastructure in place than a balanced approach oil & gas & other extractive industries can be considered. Where infrastructure is not in place the area should be protective to preserve its highest & best use which is wild and undeveloped.

Comment Letter: I-2457, I-2660

#### Miscellaneous

**MIS 1 Comment:** Please include provisions to limit outdoor lighting to the minimum needed for public safety @ BLM facilities & even then to shield those lights so they are not visible beyond the area being secured. New lights in remote areas are strongly discouraged. In rare cases where lights are necessary, they must be fully shielded.

Comment Letter: O-0003, I-2160, I-2166, I-2408, I-2504, I-2541

**MIS 2 Comment:** Impose decibel levels on dirt bikes & other ORV's.

Comment Letter: O-0003, I-2242, I-2280, I-2287, I-2296, I-2317, I-2345, I-2346, I-2403, I-2412, I-2418, I-2442, I-2470, I-2475, I-2478, I-2484, I-2509, I-2559, I-2589, I-2590, I-2617

**MIS 3 Comment:** The BLM should manage to conserve soil resources especially during drought conditions and protect soils from accelerated or unnatural erosion.

Comment Letter: O-0005

**MIS 4 Comment:** Educatation and community outreach should be the centerpiece of any land management plan that may, in some form, restrict the activities of an established industry or user group.

Comment Letter: O-0006, I-2385, I-2673

**MIS 5 Comment:** RMP revisions should consider the role that education and public outreach will play in managing human powered recreation-including climbing-and in promoting stewardship and minimum impact practices by this user community.

Comment Letter: O-0006, I-2251, I-2252, I-2265

**MIS 6 Comment:** The new RMP should be very specific regarding the status of the VRM classifications.

Comment Letter: O-0013

**MIS 7 Comment:** The new RMP should speicifically establish VRM inventories as a guideline, and that they should not be considered a "standard" in any way.

Comment Letter: O-0017, I-2314, I-2318

**MIS 8 Comment:** Provide backcountry toilets in several locations: Beef Basin Rd, Bridger Jack Spur Rd, Super Bowl camp area and Donnely Parking area.

Comment Letter: O-0019

**MIS 9 Comment:** We submit that all areas proposed for wilderness designation must be designated as VRM I to preserve the character of the landscape.

Comment Letter: O-0027

**MIS 10 Comment:** All VRM I and II areas must be classified as "no leasing" or at a minimum, "no surfact occupancy" and travel must be restricted to limited designated roads.

Comment Letter: O-0027, I-2316

**MIS 11 Comment:** BLM should establish a balance between allowing access for commercial interests and for those people who value desert untrammeled by commercial interest.

**MIS 12 Comment:** BLM needs more rangers to oversee and monitor visitors and vehicles on public lands.

Comment Letter: I-2177, I-2320, I-2563

**MIS 13 Comment:** Strong management practices should be adopted that allows a natural fire regime to be restored to these public lands.

Comment Letter: I-2181, I-2561

**MIS 14 Comment:** Contact info to expedite the reporting of improper activity should be included on sign at the beginning of each trail.

Comment Letter: I-2200, I-2470

MIS 15 Comment: RMP should discourage scenic air tours over back country areas.

Comment Letter: I-2242, I-2287, I-2345, I-2346, I-2403, I-2470, I-2475, I-2478, I-2589, I-2590, I-2617, I-2640

**MIS 16 Comment:** Education about designated wilderness & WSA's should be a priority in the new RMP.

Comment Letter: I-2257

MIS 17 Comment: Local clubs and business should be encouraged to promote responsible trail use through the development and sale of spill clean up kits, trail maps showing closed areas, ect.

Comment Letter: I-2276, I-2352, I-2452

**MIS 18 Comment:** More staffing is critical for education and enforcement of existing regulations.

Comment Letter: I-2305, I-2645

**MIS 19 Comment:** Establish fire suppression areas around developed areas.

Comment Letter: I-2358, I-2658

**MIS 20 Comment:** Educational use in unique from private boating & commercial liscensing. Districtions should be defined and then given consideration as allocations for use.

**MIS 21 Comment:** Actively eliminate from marking trails that need protection. Eliminating from publicity and a subtle that maintenace program could significantly improve resource conditions.

Comment Letter: I-2484

MIS 22 Comment: Allow natural conditions to be restored - whenever possible let wildfires burn.

Comment Letter: I-2658

**MIS 23 Comment:** Protect scenic values with liberal use of the highest use of the visual resource category.

Comment Letter: I-2682

### **Off Highway Vehicles**

**OHV 1 Comment:** There are occasional unauthorized entries of ORVs into Southeast Utah Group Parks. We would encourage ORV travel in the vicinity of the parks to be prohibited, or limited to clearly designated routes, to deter this problem in the future.

Comment Letter: G-0001

**OHV 2 Comment:** The generally accepted definition of OHV applies to motorized vehicles. ORBA recommends the description of Issue #9 be expanded to be inclusive of motorized and mechanical recreation activities

Comment Letter: O-0001

**OHV 3 Comment:** ORBA recommends that recreation use of OHVs and industry activities be considered in the process of designating areas as "open, limited or closed."

Comment Letter: O-0001, I-2223, I-2261, I-2545

**OHV 4 Comment:** Where appropriate and when done through proper planning pursuant to the NEPA and only when the agency has clearly demonstrated that cross-country travel is not appropriate, the agency should consider implementation of a 'limited to existing' designation. This is an example of an appropriate restriction applied to an appropriate use to achieve a level of resource protection.

Comment Letter: O-0001, I-2167

**OHV 5 Comment:** Vehicles should be restricted to designated roads and trails throughout the entire resource areas-no "open" ORV play areas.

Comment Letter: O-0003, I-0001 to I-0744, I-0746 to I-0948, I-0950 to I-0956, I-0958 to I-0994, I-0996 to I-1027, I-1029 to I-1164, I-1166 to I-1197, I-1199 to I-1257, I-1259 to 1296, I-2249, I-2284, I-2285, I-2301, I-2320, I-2383, I-2405, I-2433, I-2459, I-2462, I-2469, I-2470, I-2484, I-2495, I-2496, I-2527, I-2539, I-2567, I-2570, I-2573, I-2582, I-2620, I-2641, I-2680

**OHV 6 Comment:** The RMP should explicitly document the purpose of each open route.

Comment Letter: O-0003, I-2385, I-2545, I-2673

**OHV 7 Comment:** BLM should explicitly analyze the ability of any open route to withstand greatly increased use levels.

Comment Letter: O-0003, I-2476, I-2561, I-2578

**OHV 8 Comment:** In order to facilitate enforcement, there should be a 'closed unless signed open' policy.

Comment Letter: O-0003, I-2199, I-2205, I-2222, I-2223, I-2238, I-2265, I-2268, I-2315, I-2484, I-2545, I-2641, I-2659

**OHV 9 Comment:** Needs to be fair allocation between motorized and non-motorized users. Non motorized should comprise at least 40% of the total designated road/trail mileage \*See site specific route comments\*6-BLM should explicitly analyze the ability of any open route to withstand greatly increased use levels.

Comment Letter: O-0003, I-2163, I-2171, I-2241, I-2244, I-2335, I-2484, I-2513, I-2527, I-2614, I-2682

**OHV 10 Comment:** GCT recommends that "open" designation for OHV use on BLM lands be discontinued and that all recreational use of this kind be restricted to designated roads and trails.

Comment Letter: O-0005, I-2173, I-2268, I-2369, I-2484, I-2486, I-2487, I-2491, I-2495, I-2496, I-2505, I-2518, I-2521, I-2594, I-2644, I-2676, I-2682

**OHV 11 Comment:** BLM must also ensure that these routes and open areas are established in a way that minimizes conflicts with other users, including human-powered recreational users such as climbers.

**OHV 12 Comment:** Because of off-road vehicle use in the SE Utah RMP areas often causes significant irreparable damage to fragile desert soil and vegetation, sensitive wildlife and its habitat, and cultural resources, the BLM should designate most of the SE Utah RMP as "closed" to off-road vehicles.

Comment Letter: O-0006, I-2261

**OHV 13 Comment:** RMP revisions should include a comprehensive travel plan that evaluates all forms of travel, including hiking/biking, horseback, biking and OHV use.

Comment Letter: O-0006

**OHV 14 Comment:** If the world class primitve experiences currently found in SE Utah are to be maintained, the SE Utah RMP revisions should include alternatives that have measures that significantly protect against an increase in motorized recreation in the area.

Comment Letter: O-0006, I-2206, I-2484

**OHV 15 Comment:** BLM should close all ACECs and National Register-eligible sites to ORVs, limiting ORVs to primary access roads until BLM has created an ORV plan.

Comment Letter: O-0011a

**OHV 16 Comment:** ORV designations should be made through the Section 106 consultation process, examining the potential impacts of designation, including culmulative effects, and seeking to avoid or mitigate any adverse effects.

Comment Letter: O-0011a

**OHV 17 Comment:** BLM should avoid statements regarding vehicle use trampling vegetation and compressing soils, or a statement that driving a vehicle at wildlife will cause said wildlife to be disturbed. What is relevant is to disclose what, if any, the significant impacts to the human environment for any of the proposed actions are.

Comment Letter: O-0013

**OHV 18 Comment:** BLM planning must provide for the dramatic increasing demand for OHV recreation opportunities and anticipate even more demand in future years. Alternatives must prudently provide for increased OHV recreation opportunities to meet current and anticipated demand.

Comment Letter: O-0013, I-2190, I-2257, I-2383, I-2679, I-2682

**OHV 19 Comment:** All alternatives should include instructions to engage in cooperative management with OHV groups and individuals.

Comment Letter: O-0013, I-2183, I-2185

**OHV 20 Comment:** The planning team should carefully consider displaced use. Assuming that closures are eminentin some area, once could calculate approximately how much will be displaced to other areas. The planning team should develop alternatives that allow for additional access and additional recreational opportunities in suitable areas in order to properly manage the displaced use.

Comment Letter: O-0013

**OHV 21 Comment:** BLM should incorporate copperative OHV management efforts in all of the alternatives.

Comment Letter: O-0013, I-2594

**OHV 22 Comment:** \*See appendix for list of General Comments on OHV Planning pgs 21-23.

Comment Letter: O-0013, I-2201, I-2483

**OHV 23 Comment:** Educate non motorized visitors about when and where they may encounter vehicle traffic or where to avoid traffic, and educate the vehicle assisted visitor of where the road or trail might be shared with non-motorized visitors.

Comment Letter: O-0013

**OHV 24 Comment:** Reroute either use so as to avoid sectins of roads or trails that are extremely popular with both groups.

Comment Letter: O-0013, I-2538

**OHV 25 Comment:** The present country road network provides the base for and organized system but some short segments need to be added to complete a comprehensive well managed system for large and small loops.

Comment Letter: O-0014

**OHV 26 Comment:** Enforcement of current regulations and any new regulations contained in the RMP must be a top priority.

Comment Letter: O-0016, I-2300, I-2568

**OHV 27 Comment:** The Monticello RMP should pay particular attention to impact of off road vehicle and ensure that lands with the resource area, including areas previously inventoried and found to contain wilderness character are not damaged and the conflicts with other visitors are minimized.

Comment Letter: O-0019, O-0027, I-2449, I-2513, I-2600, I-2656, I-2662

**OHV 28 Comment:** No special commercial or special rec permits should be issued for ORV use in the Monticello Field Office.

Comment Letter: O-0027

**OHV 29 Comment:** All unnecessary off road vehicle trails be closed and no route left open unless it serves some leightmate and identified purpose.

Comment Letter: I-2157, I-2165, I-2181, I-2226, I-2227, I-2246, I-2255, I-2280, I-2286, I-2287, I-2303, I-2310, I-2317 to I-2319, I-2325, I-2326, I-2338 to I-2342, I-2346, I-2366, I-2403, I-2412, I-2414, I-2437, I-2442, I-2462, I-2463, I-2475, I-2478, I-2485, I-2504, I-2509, I-2513, I-2541, I-2545, I-2559, I-2566, I-2570, I-2575, I-2578, I-2588, I-2589, I-2600, I-2603, I-2605, I-2614, I-2617, I-2618, I-2625, I-2662, I-2667, I-2680

**OHV 30 Comment:** Preserve the Redrock wilderness, keep out OHV's.

Comment Letter: I-2164, I-2166, I-2180, I-2250, I-2263, I-2311

**OHV 31 Comment:** Biological-rich white wash sand dunes and associated riparian areas south of Green River, Utah should be closed to all motorized recreation.

Comment Letter: I-2166, I-2302, I-2362, I-2365, I-2425, I-24444, I-2503, I-2510, I-2524, I-2532, I-2539, I-2569, I-2586, I-2597, I-2602, I-2612, I-2651, I-2659

**OHV 32 Comment:** Consider banning commercial ORV "safaris" and other organized events.

Comment Letter: I-2163, I-2246, I-2488, I-2627, I-2651

**OHV 33 Comment:** Please limit the use of off road vehicles on BLM land (see letters listed for specific areas)

Comment Letter: I-2174, I-2270, I-2292, I-2401, I-2463, I-2493, I-2544, I-2586, I-2594, I-2628

**OHV 34 Comment:** BLM should control commercial & organized ORV use such as the Moab jeep safari & prohibit any new such events.

Comment Letter: I-1297 to I-1302, I-1304 to I-1851, I-1853 to I-1930, I-1932 to I-2007, I-2009 to I-2155, I-2171, I-2178, I-2220, I-2224, I-2295, I-2338 to I-2342, I-2354, I-2416, I-2427, I-2437, I-2449, I-2513, I-2565 to I-2568, I-2588, I-2600, I-2622, I-2662

**OHV 35 Comment:** Increasing fines or impounding vehicles will help keep people on the trails.

Comment Letter: I-2188, I-2570

**OHV 36 Comment:** Not everyone is physically capable of hiking, therefore OHV use is necessary for their recreational enjoyment.

Comment Letter: I-2194, I-2201, I-2212, I-2274, I-2327, I-2432, I-2533, I-2540, I-2560, I-2666

**OHV 37 Comment:** Issues of motorized access should be addressed by education & enforcement as opposed to closures.

Comment Letter: I-2207, I-2225, I-2259, I-2299, I-2329, I-2330, I-2361, I-2376, I-2377, I-2402, I-2421, I-2444, I-2446, I-2448, I-2460, I-2470, I-2480, I-2488, I-2538, I-2545, I-2576, I-2598, I-2647, I-2665, I-2670, I-2672

**OHV 38 Comment:** ATV & off-road use is getting out of control. There should be a total ban on the use of these vehicles except on designated trails & roads.

Comment Letter: I-2211, I-2228, I-2484, I-2517, I-2555, I-2562, I-2593

**OHV 39 Comment:** Restricted areas during special events so that only participants can use the area during specified areas.

Comment Letter: I-2575

**OHV 40 Comment:** Prohibt all OHVs.

Comment Letter: I-2237, I-2400, I-2439, I-2490, I-2522, I-2543, I-2545, I-2556, I-2606

**OHV 41 Comment:** Off road use should be restricted to limited areas.

Comment Letter: I-2260, I-2384, I-2398, I-2406, I-2412, I-2431, I-2442, I-2583, I-2618, I-2660, I-2664

**OHV 42 Comment:** Keep all exiting loops and allow for motorcycle access.

Comment Letter: I-2247

**OHV 43 Comment:** Off road vehicles should be street legal or create a designated area for them at potato salad hill or moab rim.

Comment Letter: I-2320

**OHV 44 Comment:** Please keep in mind the positive impacts the OHV industry has on the country.

**OHV 45 Comment:** No ORV access in Arch Canyon.

Comment Letter: I-2216, I-2308, I-2629, I-2634

**OHV 46 Comment:** OHV use should be excluded from sensitive.

Comment Letter: I-2469, I-2487

**OHV 47 Comment:** Roads & trails should be the minimum necessary to fulfill the need for them and would be eliminated where redundant, dense, damaging, poorly designed, difficult to manage/maintain.

Comment Letter: I-2484

**OHV 48 Comment:** Volunteer agreements with local OHV clubs get free volunteer work done for the BLM. But more importantly provide an opportunity for the clubs to provide good stewardship both for their own members and as an excellent example to visitors.

Comment Letter: I-2601, I-2679

**OHV 49 Comment:** Exclude ATV's, motorcycles, & 4x4's from 10 mile canyon.

Comment Letter: I-2682

#### **Permits**

**PTS 1 Comment:** CRMS requests the BLM to create a special use permit category for non-profit educatinal groups who meet qualifying criteria within the San Juan River permitting system.

Comment Letter: B-0004

**PTS 2 Comment:** I oppose special recreation permits for family, small club 4-wheeling.

Comment Letter: I-2183, I-2185, I-2233, I-2471, I-2483, I-2601, I-2647, I-2669

**PTS 3 Comment:** Please implement a permit system and select certain trails for large events such as, i.e. jeep safari.

Comment Letter: I-2198, I-2419, I-2679

**PTS 4 Comment:** During high peak season implement a permit system on popular trails.

Comment Letter: I-2198, I-2223, I-2652

**PTS 5 Comment:** A permit system to help raise funds and awareness for critical areas.

Comment Letter: I-2200, I-2654

**PTS 6 Comment Letter:** If commercial/organized ORV events continue to be permitted perhaps a monitary bond should be required of the organizers to pay for rehabilitation of roads & any unpermitted areas violated.

Comment Letter: I-2241

**PTS 7 Comment:** If permits are going to be required, the process of obtaining them should be quick, simple, & minimal fees should be involment-groups should also be able to plan events without scheduling them months ahead of time.

Comment Letter: I-2244, I-2483

**PTS 8 Comment:** BLM should avoid permitting activities that would impair wilderness qualities or WSA's and should great restraint in permitting activities in areas identified in Babbit's reinventory.

Comment Letter: I-2293

**PTS 9 Comment Letter:** Permit the public use of Green & San Juan Rivers to private trips rather than prioritizing commercial trips.

Comment Letter: I-2431

**PTS 10 Comment:** A motorized use permit system would increase opportunities to educate the public about minimum impact use & aid in enforcement.

Comment Letter: I-2470

**PTS 11 Comment:** Opposed to any new SRP mandates in the new RMP.

Comment Letter: I-2483

**PTS 12 Comment:** Please consider the value of educational use of BLM land. The studies performed on BLM are necessary & appropriate. Consider a permitting system that doesn't force these groups to contract at an unaffordable cost to existing outfitters.

Comment Letter: I-2498, I-2661

**PTS 13 Comment:** Stop user fees on public land.

# **Process Plan and Approach**

**PPA 1 Comment:** RMP should meet a consistency review with the County Plan and that, in keeping with legal rights, the County be granted cooperating agency status.

Comment Letter: G-0005, I-2198, I-2451

**PPA 2 Comment:** It's important that ACEC, VRM, SMRA, and WSR concepts should be viewed as aids to be used with the multiple use sustained yield mandate of FLPMA and are in compliance with the local County Plan.

Comment Letter: G-0005, I-2451

**PPA 3 Comment:** Range of Alternatives development and selection process for the RMP should remain limited to local governments, state agencies, and federal agencies as cooperating agencies, as directed by the NEPA process.

Comment Letter: G-0005

**PPA 4 Comment:** San Juan had a road agreement with the Bureau. The agreement served as a successful model for cooperation with the agency and outlines a working treatise for discussion and problem solving. The Bureau hose to dissolve that agreement in the mid-90's. It might be well to rethink that issue again during this planning effort.

Comment Letter: G-0006, I-2507

**PPA 5 Comment:** The county is interested in having an alternative developed that would address the full spectrum of recreation opportunities in the county.

Comment Letter: G-0006

**PPA 6 Comment:** Castle Rock-This area needs to see concentrated management to address the damage that has already occurred and manage the use for the future.

Comment Letter: G-0010

**PPA 7 Comment:** We would like to see the BLM make changes in management to protect the resource and close areas as is necessary.

Comment Letter: G-0010

**PPA 8 Comment:** We oppose all ground disturbing activities on BLM land with the potential to disturb the remains of our ancestors.

**PPA 9 Comment:** Glenn Canyon NRA formally request cooperator status on this plan

Comment Letter: G-0020

**PPA 10 Comment:** ORBA recommends that Moab and Monticello continue to develop their RMP's in a coordinated fashion and remove the effort to extend coordination to Price and Grand Junction offices.

Comment Letter: O-0001

**PPA 11 Comment:** Planning issues: 1) Additional SRMAs requiring enhanced or special management for rec uses or for protection of rec related resource values 2) Identifying rec activity emphasis areas/ROS management zones; and 3) Identifying backcountry management objectives be eliminated as they are redundant with existing guidance and laws.

Comment Letter: O-0001, I-2383

**PPA 12 Comment:** Agency should establish a process that: 1) defines the process for selecting specific roads and trails within the limited area; 2) defines criteria for limitations on use; 3) Establish the criteria used to define the limited areas or sub areas; 4) conduct the 'selection of a network of roads and trails' for all limited areas.

Comment Letter: O-0001, I-2251, I-2545

**PPA 13 Comment:** ORBA recommends that the route inventory and designation process be addressed on a separate schedule to allow for accurate and complete process and provide for a more complete definition of the recreation opportunity spectrum.

Comment Letter: O-0001

**PPA 14 Comment:** In developing the RFD, BLM must use a method that incorporates historical data on what types of impacts have actually accurred in the area through a collaborative effort with independents.

Comment Letter: O-0002

**PPA 15 Comment:** IPAMS supports a level of analysis for the RMP that will alllow further environmental analysis of most natural gas and oil development to be tiered directly back to the RMP requiring no more than an EA.

Comment Letter: O-0002, I-2682

**PPA 16 Comment:** The AMS should include data on actual grazing use, and grazing management practices and goals for as far back as data exists. In the past, the BLM has averaged grazing use for five years and presented this in NEPA analyses. This approach is not adequate.

Comment Letter: O-0004, I-2574

**PPA 17 Comment:** Past capability analysis may date back 30 years and be based on inadequate data and methods not inconistent with with BLMS current management obligations. For this reason, we recommend updating livestock capability assessments using the most recent NRCS soils data and current range condition monitoring.

Comment Letter: O-0004

**PPA 18 Comment:** The agency must accumulate sufficient data and consider relevant rigorous science to determine what uses are appropriate in any given area \*\*\*\*refer to the GSENM guidance document (CD) for a more detailed discussion of various factors, issues and conflicts.

Comment Letter: O-0004, I-2284, I-2659

**PPA 19 Comment:** BLM needs a drought management plan that can be acted on quickly to remove livestock and stop other damaging uses when public lands and wildlife are severely stressed.

Comment Letter: O-0005

**PPA 20 Comment:** BLM should adopt a "vision" statement for the RMP that reflects the significant historic and cultral resourcs. This vision statement should guide each alternative and management objective.

Comment Letter: O-0011a, I-2638

**PPA 21 Comment:** BLM should take proactive steps to comply with the mandates of Section 110(a) of the NHPA, identifying within the RMP how BLM intends to comply with its stewardship repsonsibilities, especially when considering the impacts that other potential uses within the area may have on historic and cultural resources.

Comment Letter: O-0011a

**PPA 22 Comment:** Increase protectoin for current ACECs and designate new areas as ACECs.

Comment Letter: O-0011a

**PPA 23 Comment:** Rather than allow for excavation, which is considered an adverse effect, we recommend that BLM amend these management directives to reflect the "prevention of irreparable damage" standard under FLPMA.

Comment Letter: O-0011a, I-2348

**PPA 24 Comment:** Adopt the Cultural Resource Mangement Plan (CRMP) for the Cedar Mesa ACEC and the Grand Gulch Plateau Special Recreation Management Area, and provide additional modifications and restrictions necessary to protect the values of these areas; Create Cultural Resource Management Plans for Alkali Ridge ACEC, Hovenweep ACEC, Dark Canyon ACEC, and all newly designed ACECs.

Comment Letter: O-0011a, I-2438

**PPA 25 Comment:** BLM needs to add a provision ensuring management prescriptions are consisten, or at least not inconsistent with applicable law, including Utah state law.

Comment Letter: O-0013

**PPA 26 Comment:** BLM should clarify which Land Health Standards apply to which activities and uses and should also clarify what "generally be evaluated on watershed basis" means.

Comment Letter: O-0013

**PPA 27 Comment:** The Moab and Monticello Planning team(s) should work to improve public outreach and involvement.

Comment Letter: O-0013

**PPA 28 Comment:** Consider alternative communication methods such as posting of major roads entering the Planning Area with notices and updates regarding the planning process.

Comment Letter: O-0013

**PPA 29 Comment:** Consider a program to improve the publics ability to work with the NEPA process . \*\*\*See suggestions for website improvement-General Comments pg. 3 & 5.

Comment Letter: O-0013

**PPA 30 Comment:** BLM must analyze the Socio-Eco benefits of protecting wilderness character landscapes in the RMP, as part of the analysis.

Comment Letter: O-0016

**PPA 31 Comment:** BLM must evaluate the costs and benefits of preventing damage to the spectacular, and extremely valuable cultural, wildlife, water, soil, veg, wilderness and primitive recreation resources in the Monticello Field Office area.

Comment Letter: O-0027

**PPA 32 Comment:** The "range of alternatives" development process should be open to all within the conservation & scientific communities as well as the counties and state.

Comment Letter: O-0027, I-2156

**PPA 33 Comment:** RMP should reflect the needs of all resources, but weighed heavily toward preservation rather than explotation.

Comment Letter:I-2157, I-2159, I-2180, I-2196, I-2237, I-2261, I-2268, I-2288, I-2365, I-2378, I-2398, I-2401, I-2423, I-2437, I-2440, I-2484, I-2487, I-2503, I-2510, I-2512, I-2524, I-2526, I-2527, I-2532, I-2539, I-2547, I-2567, I-2569, I-2588, I-2597, I-2600, I-2612, I-2622, I-2626, I-2629, I-2633, I-2659, I-2680

**PPA 34 Comment:** Use organizations as allies to solve land used problems.

Comment Letter: I-2244, I-2364, I-2438, I-2451, I-2507, I-2565, I-2566, I-2620, I-2682

**PPA 35 Comment:** BLM should institute a public info campaign with sinage about the importance of protecting cryptobiotic soil.

Comment Letter: I-2244, I-2265

**PPA 36 Comment:** An outdoor rec. focused agenda and economy will bring sustainale growth to the area and is the right balance to focus on for jobs, the land, and for our children.

Comment Letter: I-2265, I-2351, I-2563

**PPA 37 Comment:** Limit motorized recreation & development on public lands while continuing to support activities such as climbing primative camping & back country hiking.

Comment Letter: I-2351, I-2360

**PPA 38 Comment:** Consider all lands proposed for wilderness & manage these lands for the protection of these resources. This would exclude all types of motorized travel & mineral developments.

Comment Letter: I-2360, I-2365

**PPA 39 Comment:** Establish a scientifically based monitoring system to facilitate sustainable management of all lands & alert response in the early stages of degradation.

Comment Letter: I-2213, I-2230, I-2268, I-2273, I-2305, I-2309, I-2365, I-2375, I-2383, I-2398, I-2411, I-2425, I-2437, I-2400, I-2444, I-2445, I-2447 to I-2450, I-2470, I-2477, I-2478, I-2481, I-2484, I-2503, I-2510, I-2512, I-2513, I-2524 to I-2527, I-2532, I-2539, I-2545, I-2551, I-2552, I-2557, I-2561, I-2567, I-2570, I-2577, I-2588, I-2589, I-2594, I-2597, I-2599, I-2600, I-2612, I-2611, I-2622, I-2623, I-2627, I-2631, I-2632, I-2636, I-2640, I-2650, I-2651, I-2655, I-2663, I-2667, I-2682

**PPA 40 Comment:** Coordination with the users & counties can result in elimination of redundant roads without adversely impacting access.

Comment Letter: I-2404

**PPA 41 Comment:** Management approach must include development of additional recreation facilities improvement of wildlife habitat, native noxious weeds, and insect pest control, grazing and range improvements, watershed management, and accommodating mineral and energy development.

Comment Letter: I-2404, I-2554

**PPA 42 Comment:** RMP must comply with county plans to the maximum extent feasible planning efforts should at least match the scope of issues & objectives in these plans.

*Comment Letter:* I-2554, I-2610

**PPA 43 Comment:** BLM should institute a long-term surface disturbance-monitoring program to monitor surface impacts of recreational activities.

Comment Letter:I-2682

### **Rangeland and Grazing**

**RG 1 Comment:** BLM should determine that certain lands with high recreational and wildlife values are NOT "chiefly valuable for grazing and the raising of forage crops.

Comment Letter: O-0003

**RG 2 Comment:** Appendix B of the Guidance Document for the GSENM (CD) presents a new model for calculating the forage that can be allocated to livestock while still allowing for the ecological needs of the land to be met.

Comment Letter: O-0004

**RG 3 Comment:** Utilization levels of 50% will cause significant damage to ecosystem values in the arid West is bourn out by the range science literature. \*\*\*See CD for further detail.

Comment Letter: O-0004

**RG 4 Comment:** \*\*See pg. 16 for additional data needed in order to design and defend the proposed grazing program.

Comment Letter: O-0004

**RG 5 Comment:** 3 alternatives should be analyzed in the RMP revisions. 1) would analyze current management practices, and 2) would analyze predicted conditions if no grazing regime were set in place. 3) the "Rangeland Health Alternative" would address the need to restore and maintain the health and productivity of rangelands in the Moab/Monticello area. \*\*see pg 17-22 for more detailed info about alternatives.

Comment Letter: O-0004

**RG 6 Comment:** For allotments failing to meet the standards, the BLM should eliminate grazing in the growing season and further limit grazing in other seasons to a level that does not slow progress of the allotments towards meeting rangeland health standards.

Comment Letter: O-0004, I-2211, I-2316, I-2319, I-2325, I-2555, I-2562, I-2578, I-2680

**RG 7 Comment:** Lowering permit numbers to more realistic levels would be a significant step in this direction with beneifits for the land and the American people, including stabilizing ranching operations at levels that would not have to vary so widely with changes in climate.

Comment Letter: O-0005

**RG 8 Comment:** Base property size needs to be on a sliding scale according to herd size. if the base property is not large enough for the numbers on the allotment, the permitted numbers should be reduced accordingly.

Comment Letter: O-0005

**RG 9 Comment:** There should be a process, consisten with NEPA, FLMPMA and the Taylors Grazing property is not large enough for the numbers on the allotment, the permitted numbers should be reduced accordingly.

Comment Letter: O-0005

**RG 10 Comment:** The BLM needs to either hire more field staff, or to subcontract out the work to an experienced and licensed team. The records are simply not available to guide the agency or inform the public. If an allotment is at risk, there is no paperwork to prove it.

Comment Letter: O-0005

**RG 11 Comment:** Monitoring should use the best range science and be consistently applied, done annually and have immediate consequences for the number of cows on an allotment.

Comment Letter: O-0005

**RG 12 Comment:** With lands so degraded from years of use and drought, the Grand Canyon Trust recommends BLM have a procedure for quickly retiring cows from allotments that have been abused or in cases where permittees have been persuaded to relinquish their grazing priviledges through private transactions.

Comment Letter: O-0005, I-2464, I-2570

**RG 13 Comment:** Riparian areas that are "Functioning at Risk" or "Not Functioning" should have livestock removed.

Comment Letter: O-0005

**RG 14 Comment:** Because of the inadequate forage on overgrazed spring range, with poor winter range, deer suffer heavy fawn mortality.

**RG 15 Comment:** Economic comparison of the benefits of livestock and wildlife to local communities may suggest wildlife and hunting bring in more money to the community.

Comment Letter: O-0005

**RG 16 Comment:** It is not BLM's duty to maximize livestock production to suit permittes, rather BLM must engage in 1)balancing of competing resource values, with some land being used for less than all the resources; 2)management of resources without permanent impairment of the productivity of the land and quality of the environment; 3) prevention of undue or unnecessary degradation of the land.

Comment Letter: O-0007

**RG 17 Comment:** Current grazing practices are not allowing the land to recover. You must address this issue by doing a capability, suitability and forage capacity analysis for the Resource Area using science-based criteria -

Comment Letter: O-0007, I-2605

**RG 18 Comment:** Encourage BLM to identify locations where grazing leases may be incompatible with the protection and perservation of the Monticellos cultural resources and historic landscapes.

Comment Letter: O-0011a, I-2156

**RG 19 Comment:** To protect against adverse impacts on grazing, BLM should: develop management objectives to control adverse effects; establish a method of "conservation buy-outs" of grazing permits and leases form willing sellers and retiring permits.

Comment Letter: O-0011a

**RG 20 Comment:** Refrain from issuing new grazing permits or renewing expired permits within the Monticello area unless adequate stipulations and restrictions are incorporated.

Comment Letter: O-0011a

**RG 21 Comment:** USA-ALL recommends that BLM supplement the information on their website so that the general public may understand the issue, controversy and the range of alternatives that will be studied, a description of how Rangeland Management relates to livestock grazing as well as other activities and also a discussion of the laws governing livestock grazing would be helpful.

<sup>\*\*</sup>see pgs 1-2 for list of criteria

<sup>\*\*</sup>see letter for data concerning the relationship between precipitation, livestock and forage.

**RG 22 Comment:** We strongly encourage the BLM to consider the holistic approach to range management. This has been proven effective to maintain the rangeland standards and while allowing ranchers to maintain economically vialbe live stock grazing operations.

Comment Letter: O-0013

**RG 23 Comment:** USA All encourages BLM to sign the Cooperative Rangeland Monitoring Program Assessment with the National Public Lands Council and the National Cattlemens Beef Association.

Comment Letter: O-0013

**RG 24 Comment:** The RMP should address a more steamlined process for approving the construction of new ponds for stock watering.

Comment Letter: O-0013

**RG 25 Comment:** Grazing and recreation are both appropriate activities for many BLM lands, but the RMP should seek to segregate these uses so that both can occur without hindrance from the other.

Comment Letter: O-0016

**RG 26 Comment:** Contain grazing areas into a manageable size and use annual lease contracts for same.

Comment Letter: O-0019, I-2628

**RG 27 Comment:** Utah FNAWS recommends that the BLM follow BLM guidelines and eliminate all domestic sheep allotments within the planning areas, as the opportunity arises.

Comment Letter: O-0021

**RG 28 Comment:** Eliminate all domestic sheep allotments within the palnning areas. Specifically, FNAWS requests the conversion of the Floy Creek and Crescent Junction allotments from domestic sheep to cattle.

Comment Letter: O-0022, I-2664

**RG 29 Comment:** Additionally, FNAWS asks the BLM to incorporate within the RMP plans to convert the remaining allotments east of Crescent Junction to the Colorado GBOrder, as opportunities arise.

**RG 30 Comment:** FNAWS requests that the BLM specifically protects bighorn sheep in the Rattlesnake herd, Professor Valley herd, Potash herd, North San Juan herd, and the Dolores Triangle herd.

Comment Letter: O-0022

**RG 31 Comment:** All rangelands should undergo a rangeland assessment per the Interpreting Indicators of Rangeland Health-technical reference .

Comment Letter: O-0023

**RG 32 Comment:** The RMP should identify allotments suitable for reallocation to non-livestock use based on consideration of wildlife oand other resource concerns.

Comment Letter: O-0023, I-2563

**RG 33 Comment:** All riparian systems should be evaluated for Proper Functioning Condition according to the latest methodology. Where streams are not a properly functioning condition as a result of livestock grazing, ranchers should be held accountable for removing their cattle while BLM and ranchers work to actively restore all stream reaches to properly functioning condition. Then all livestock should be managed in such a way as to maintain proper functioning condition.

Comment Letter: O-0023, I-2213, I-2438

**RG 34 Comment:** The RMP should allow for extended periods(beyond three years) of non-use for conservation purposes at the discretion of the allotment user.

Comment Letter: O-0023

**RG 35 Comment:** There needs to be provisions to implement range improvement policies. Past policies have not worked.

Comment Letter: I-2603

**RG 36 Comment:** Restore wildlife habitat by putting a stop to grazing in riparian zones & other sensitive areas.

Comment Letter: I-2160, I-2166, I-2664

**RG 37 Comment:** If budget constraints do not allow for proper monitoring and enforcement of regulations then grazing fees need to be adjusted to at least cover the basic costs.

Comment Letter: I-2228

**RG 38 Comment:** Limit livestock grazing to a sustainable level, so not to overwhelm landscape.

Comment Letter: I-2284, I-2383, I-2463

**RG 39 Comment:** Open range should be protected from trail development, yet, remain useable for tourism.

Comment Letter:I-2429

**RG 40 Comment:** Close all grazing allotments.

Comment Letter: I-2431, I-2658, I-2676

**RG 41 Comment:** Close grazing allotments that are in 'poor' or only in 'fair' condition.

Comment Letter: I-2443, I-2505

**RG 42 Comment:** We are opening public land to grazing at a fraction of the cost to graze the resource is being downgraded cheaply.

Comment Letter: I-2584

### **Recreation**

**REC 1 Comment:** Important park viewsheds should be identified in the RMPs, and land uses should be managed to maintain the quality of these views. Including minimizing and shielding night lighting.

Comment Letter: G-0001

**REC 2 Comment:** The emphasis for recreational opportunity would include the development of needed campsites, staging areas, equestrian trails, motorized trails, and maintaining areas for primitive and back country recreational opportunities.

Comment Letter: G-0002

**REC 3 Comment:** It is Uintah County's concern that lands not be closed to multiple use and rest treited to only single use, and particularly to only speicalized use within a single use designation.

Comment Letter: G-0002, I-2499

**REC 4 Comment:** \*See G-2 or G-19 for San Juan County Rec Alternative.

Comment Letter: G-0007a

**REC 5 Comment:** An alternative that maximizes recreation opportunity should be developed.

**REC 6 Comment:** We encourage BLM to promote and designate recreational activites that will have minimal impacts on the histoirc landscapes and cultural sites within the Monticello field area.

Comment Letter: O-0001, I-2336, I-2379

**REC 7 Comment:** BLM should incorporate a vigorous recreational education program into all mangement alternatives.

Comment Letter: O-0006

**REC 8 Comment:** Recreation Opportunity Spectrum(ROS) should be available for public view and comment prior to the release of any draft alternatives.

Comment Letter: O-0011a

**REC 9 Comment:** Outline specific areas for 'dry' camping, and 2 others for small camper access/parking.

Comment Letter: O-0013

**REC 10 Comment:** All lands within WSAs, BLM inventoried lands of wilderness character, proposed wilderness, and ACECs should be managed as ROS class primitive, while certain other spectacular lands in the Resource area should be managed as ROS semi primitive.

Comment Letter: O-0013

**REC 11 Comment:** Within the zone of heavy use around Moab, approximately a 30 mile radius, the travel plan should ensure that all areas are closed to vehicle supported camping unless designated as open.

Comment Letter: O-0019

**REC 12 Comment:** Within the zone of heavy use around Moab, there should be no gathering of wood.

Comment Letter: O-0027

**REC 13 Comment:** All mountain bikes should be treated as motorized vehicles and be restricted to designated roads and trails as defined in the travel plan.

Comment Letter: O-0027

**REC 14 Comment:** No campgrounds should be constructed in important habitat for special designation species or other species of concern.

**REC 15 Comment:** All vehicle supported campers and day users should be required to use constructed toilets or pack out their human waste.

Comment Letter: O-0023

**REC 16 Comment:** Climbing routes that are disturbing nesting birds of prey should be closed seasonally or permanently.

Comment Letter: O-0023

**REC 17 Comment:** Base jumping should only be allowed in designated areas.

Comment Letter: O-0023

**REC 18 Comment:** Special events should be limited in number and size.

Comment Letter: O-0023

**REC 19 Comment:** It would benefit land use plans to recognize small "open" areas & allow these uses with appropriate restrictions. Open areas have a district advantage- no need for design, planning, or maintenance.

Comment Letter: O-0023

**REC 20 Comment:** BLM should not build harden campsites unless proven necessary & facilities for RV's & motor homes should be left to the private sector.

Comment Letter: O-0023, I-2197

**REC 21 Comment:** These areas should be kept as hiking only- see letters listed below.

Comment Letter: O-0023, I-2198, I-2206, I-2254, I-2470

**REC 22 Comment:** Camping should be regulated in areas where sanitation is an issue or where unregulated camping becomes a visual impairment.

Comment Letter: O-0023, I-2223

**REC 23 Comment:** Keep existing rock climbing areas open-as well as primitive camping.

Comment Letter: O-0024, I-2397

**REC 24 Comment:**Allow use of small fires in primitive areas, as long as they are contained in fire pans.

Comment Letter: I-2189, I-2207, I-2225, I-259, I-2329, I-2330, I-2361, I-2376, I-2377, I-2402, I-2417, I-2420, I-2421, I-2474, I-2476, I-2510, I-2576, I-2598, I-2670

**REC 25 Comment:** Indian Creek is vulnerable. It needs toilets and a legal place to camp. Popularity among climbers all over the world makes it a dicey situation.

Comment Letter: I-2196, I-2451, I-2501

**REC 26 Comment:** No firewood gathering.

Comment Letter: I-2197, I-2544, I-2599

**REC 27 Comment:** Do not allow dogs to free roam with campers.

Comment Letter: I-2198, I-2206, I-2254, I-2470, I-2544

**REC 28 Comment:** Make all boaters carry waste containers. I-2544

Comment Letter: I-2223, I-2544

**REC 29 Comment:** Make a map of rockless areas showing primitive and unconfined recreation.

Comment Letter: I-2397, I-2501, I-2671

**REC 30 Comment:** Allow use of small fires in primitive areas, as long as they are contained in fire pans.

Comment Letter: I-2417

**REC 31 Comment:** Recreational uses should not alter the landscape.

Comment Letter: I-2440

**REC 32 Comment:** Indian Creek is vulnerable. It needs toilets and a legal place to camp. Popularity among climbers all over the world makes it a dicey situation.

Comment Letter: I-2501

**REC 33 Comment:** Make a map of rockless areas showing primitive and unconfined recreation.

Comment Letter: I-2671

# **Special Designation**

**SD 1 Comment:** WSR-In Natural Bridges National Monument, White Canyon Creeek and tis tributary, Armstrong Canyon Creek, were found both eligible and suitable for the NWSR in the "wild" classification.

Comment Letter: G-0001, I-2198

**SD 2 Comment:** WSR-In Arches and Canyonlands NPs, eligibility studies, but not suitability studies have been conducted. \*Refer to letter G-0001 to view segments that have been determined eligible.

Comment Letter: G-0001, I-2198

**SD 3 Comment:** WSR-see G-0003 for list of trust land through which the potential eligible WSR segments pass.

Comment Letter: G-0003

**SD 4 Comment:** Uintah County is opposed to the designation of WSR on waters within Uintah County or waters that will have an impact on Uintah County.

Comment Letter: G-00076

**SD 5 Comment:** Uintah County is strongly opposed to WSR designation on any river, creek, spring, wash ect. Within the County, or on waters that affect Uintah County.

Comment Letter: G-00076

**SD 6 Comment:** \*See G-7b for references from the County General Plan to explain position on WSR designations.

Comment Letter: G-00076

**SD 7 Comment:** The Council has chosen a "non-support" response to the following river segments and their outstandingly remarkable values and tentative classifications \* see G-18 for list of river segments.

Comment Letter: G-0018

**SD 8 Comment:** \*\*\*See appendix for list of changes to draft WSR segments and recommended designations.

Comment Letter: O-0005

**SD 9 Comme nt:** If Wild and Scenic designations take place, these areas should be classified as VRM Class 1.

Comment Letter: O-0005

**SD 10 Comment:** URC supports the determination of potential eligibility for 16 segments, with additional comments.

**SD 11 Comment:** No basis is given for the tentative classifications granted to segments. Without this documentation, it is impossible for us to submit meeaningful comments supporting or disputing the agency's tentative classification decisions.

Comment Letter: O-0009

**SD 12 Comment:** ORVs are not adequately chronicled for 16 potentially eligible segments. Without this info, it is impossible to understand or comment on the exclusion of some ORVs for these segments.

Comment Letter: O-0009

**SD 13 Comment:** Although we support 16 segments identified as potentially eligible, the remaining 149 segments were dismissed without any supporting rationale. BLM is requested to provide specific evaluation criteria used to rule out each of the 149 segments.

Comment Letter: O-0009

**SD 14 Comment:** WSR- because each classification dictates the extent of use, we encourage BLM to seek classifications that reflect each river segemnts current value, ie if there are no paved access roads, BLM should classify that segment as "wild" and not as "scenic" or "recreational".

Comment Letter: O-0011a

**SD 15 Comment:** BLM must not use a "Zone Management" concept to establish de-facto Wilderness or Wilderness Study Areas or to remoe areas from multiple use/sustained yield management.

Comment Letter: O-0013

**SD 16 Comment:** WSR -Nominations for inclusion in the National Wild and Scenic Rivers System should be limited to those sections of river in which view-shed is restricted by terrain or where view-shed in excess of one-eight mile is eligible for wilderness designation.

Comment Letter: B-0003

**SD 17 Comment:** SUWA submits these wilderness proposals during the Monticello FO RMP process so that the planning process can adequately incorporate this new info into the RMP - see appendix A of SUWA.

Comment Letter: O-0027

**SD 18 Comment:** Designation of riparian areas and wetlands as ACECs.

**SD 19 Comment:** Designations of ACECs will supersed all travel designations including specific vehicle route designations.

Comment Letter: O-0027

**SD 20 Comment:** \*\*See G-21 for comments on specific river segments.

Comment Letter: G-0021

**SD 21 Comment:** Areas within the wilderness proposal for Utah wilderness coalition (UWC) should be closed to all ORV use.

Comment Letter: I-2157, I-2159, I-2171, I-2175, I-2338 to I-2342, I-2413, I-2485, I-2505, I-2565, I-2588

**SD 22 Comment:** All areas found to have wilderness characteristics in the 1999 BLM inventory, plus the areas now being considered wilderness by congress in America's Redrock wilderness act should be identified as WSA's.

Comment Letter: I-2160, I-2173, I-2204, I-2206, I-2261, I-2278, I-2283, I-2305, I-2308, I-2401, I-2433, I-2541, I-2573, I-2578, I-2581, I-2586, I-2602, I-2626, I-2629, I-2633, I-2682

**SD 23 Comment:** A "no surface occupancy" requirements on all mineral leasing in all the areas proposed for wilderness in America's Redrock wilderness act should be used.

Comment Letter: I-2160, I-2527

**SD 24 Comment:** (same as OHV 27) This RMP should include measures to restrict motorized vehicle travel in the areas proposed in America's Redrock Wilderness Act.

Comment Letter: I-2160

**SD 25 Comment:** Streams are not rivers & should not be considered for designation as wild & scenic rivers.

Comment Letter: I-2172

**SD 26 Comment:** As a suggestion- close all areas in Utah Wilderness coalitions wilderness proposal to leasing & OHV use.

*Comment Letter:* I-0001 to I-0744, I-0746 to I-0948, I-0950 to I-0956, I-0958 to I-0994, I-0996 to I-1027, I-1029 to I-1164, I-1166 to I-1197, I-1199 to I-1257, I-1259 to I-1296, I-2175, I-2338 to I-2342

**SD 27 Comment:** See the listed letters for recommendations of river segments to be designated for wild & scenic rivers.

Comment Letter: I-2181, I-2254, I-2491, I-2604

**SD 28 Comment:** We do not support defacto wilderness study areas such as BCMA or same other similar designation.

Comment Letter: I-2185, I-2483, I-2601

**SD 29 Comment:** More ACEC's should be designated.

Comment Letter: I-2197, I-2595

**SD 30 Comment:** Additional wilderness designations should be persuaded & determinations made.

Comment Letter: I-2200, I-2542, I-2606

**SD 31 Comment:** I don't support locking up a chunk of real estate which is "possible" habitat for "potential" endangered species. This is not a balanced approach and smacks of anti-OHV sentiment.

Comment Letter: I-2327

**SD 32 Comment:** Segments of The Green, Colorado, Delores, & San Juan need strick protection as they hold unique artifacts of ancient civilizations.

Comment Letter: I-2415

**SD 33 Comment:** I support WSR's.

Comment Letter: I-2282, I-2461, I-2463

**SD 34 Comment:** The BLM should not designate any new wild & scenic rivers at this time.

Comment Letter: I-2472

**SD 35 Comment:**See I-2505 for list of WSR segments.

Comment Letter: I-2505

**SD 36 Comment:** Do not nominate numerous dry washed as tentative wild scenic as tentative wild/scenic recreational rivers.

Comment Letter: I-2580

**SD 37 Comment:** Retain the designation of the biologically based ACEC's within the planning areas and actively manage them to avoid adverse impacts.

Comment Letter: I-2639, I-2640

**SD 38 Comment:** Designate and manage as new ACEC's several additional locations within the planning areas that are documented to contain relevant and important biological resources.

Comment Letter: I-2640

**SD 39 Comment:** The use of nominations of dry washes as wild rivers for the ultimate purpose of closing roads and trails should not be done.

Comment Letter: I-2601

### **Threatened and Endangered Specs**

**TES 1 Comment:** BLM should support any conclusions on the impacts of livestock grazing on habitat function for species at risk with existing scientific analysis.

Comment Letter: O-004

**TES 2 Comment:** The DEIS and revised RMP's need to establish utilization levels that will consistently allow the rangelands in the Moab/Monticello Field Offices to achieve and continue to meet the Standards and Guidelines for Rangeland Health.

Comment Letter: O-004

**TES 3Comment:** The conservancy would like to see primacy given to protection of Endagered, threatened and Sensitive species where they may be adversely affected by other land uses.

Comment Letter: O-0023, I-2639

# **Transportation**

**TRANS 1 Comment:** Decrease road infrastructure, eliminating duplicateve or unnecessary roads.

Comment Letter: O-0003

**TRANS 2 Comment:** Eliminate roads that threaten historic values, including historic landscapes.

Comment Letter: O-0011a, I-2223, I-2392, I-2561, I-2673, I-2680, I-2682

**TRANS 3 Comment:** Allow access only for those activities that will not adversely affect historic places within the Monticello field area.

Comment Letter: O-0011a, I-2315, I-2484

**TRANS 4 Comment:** The general public should be given adequate time to submit route data.

Comment Letter: O-0011a

**TRANS 5 Comment:** Regardless of pending litigation or negotiations over RS2477 assertations, BLM must find a way of dealing with this issue that is consistent, or at least not inconsistent, with applicable law and which does not force the counties or other public land users into adversarial positions and expensive litigation.

Comment Letter: O-0013, I-2492, I-2554

**TRANS 6 Comment:** This should not allow alternatives to be developed that purports to close or limit the use of 2477 assertations.

Comment Letter: O-0013

**TRANS 7 Comment:** Any attempt to formulate a "travel limited to designated roads and trails" regime must include EVERY road an trail asserted as a 2477.

Comment Letter: O-0013, I-2362, I-2574, I-2666

**TRANS 8 Comment:** The general public should be given adequate time to submit route data.

Comment Letter: O-0013

**TRANS 9 Comment:** Airstrips represent already distrubed areas. In some cases, major cut and fill techniques were used during construction. To maintain them to minimal standards, the UBCP would suggest a five point program:brush removal, surface grading, seeding, windsock, advisory signs.

Comment Letter: O-0015

**TRANS 10 Comment:** We ask BLM to include in the RMP a comprehensive plan for routes of travel, addressing all modes. BLM should close motor routes that are not needed for public purposes identified in the plan.

Comment Letter: O-0017

**TRANS 11 Comment:** \*\*\*See appendix for additions to the O-13 trail plan.

Comment Letter: O-0013, O-0017, O-0020

**TRANS 12 Comment:** Travel planning and effective management of motorized use is the key issue in this planning area. We encourage the BLM to develop a travel plan as part of this RMP.

**TRANS 13 Comment:** A comprehensive travel plan, which allows for both motorized and non motorized travel, should be completed concurrently with, and adopted by the RMP. The plan should designate specific trails for ORVs, mountain bikes, hikers, and equestrian users, etc.

Comment Letter: O-0027, I-1297 to I-1302, I-1304 to I-1851, I-1853 to I-1930, I-1932 to I-2007, I-2009 to I-2155, I-2198, I-2204, I-2222, I-2226, I-2237, I-2239, I-2246, I-2250, I-2252, I-2261, I-2262, I-2278, I-2288, I-2299, I-2322, I-2325, I-2335, I-2338 to I-2342, I-2348, I-2353, I-2358, I-2391, I-2395, I-2397, I-2401, I-2409, I-2416, I-2423, I-2425, I-2427, I-2428, I-2440, I-2443, I-2462, I-2464 to I-2466, I-2484, I-2485, I-2487, I-2488, I-2491, I-2492, I-2500, I-2503, I-2512, I-2521, I-2524, I-2527, I-2541, I-2545, I-2547, I-2559, I-2562, I-2567, I-2569 to I-2571, I-2575, I-2581, I-2586, I-2590, I-2595, I-2597, I-2612, I-2615, I-2617, I-2622, I-2626, I-2629, I-2631, I-2633, I-2634, I-2650, I-2659, I-2662, I-2663, I-2673, I-2679, I-2682

**TRANS 14 Comment:** The RMP travel plan should include the subcomponent of an enforcement plan, with sufficient FO budgeting.

Comment Letter: O-0027

**TRANS 15 Comment:** After designation of trails, clearly mark trails so that all users will be aware of where ORV use is, and is not appropriate and prohibit ORV use unless routes are specifically marked and designated as available for the use.

Comment Letter: O-0027, I-2320, I-2469, I-2571

**TRANS 16 Comment:** Implement effective, frequent monitoring of ORV impacts, and set clear benchmarks which, if exceeded, trigger immediate closure of an area to ORVs sanctioned by the RMP.

Comment Letter: O-0027, I-2264

**TRANS 17 Comment:** Restrict ORVs from WSA's, from critical wildlife habitat, and riparian and wetland areas.

Comment Letter: O-0027, I-2316, I-2570, I-2571

**TRANS 18 Comment:** No unrestricted, cross country use in the Monticello area.

Comment Letter: O-0027

**TRANS 19 Comment:** Maintain access in a way that minimizes harmful long term impacts and preserves the beauty and ecology of the area..

Comment Letter: I-2161, I-2413

**TRANS 20 Comment:** RMP revisions should include a comprehensive travel plan that evaluates all forms of travel, including hiking/biking, horeseback, and OHV use.

Comment Letter: I-2159, I-2166, I-2180, I-2231

**TRANS 21 Comment:** Please do not close any trails.

Comment Letter: I-2162, I-2168, I-2184, I-2185, I-2188, I-2192, I-2195, I-2202, I-2203, I-2214, I-2215, I-2229, I-2232 to I-2234, I-2236, I-2240, I-2249, I-2253, I-2256, I-2269, I-2323, I-2352, I-2357, I-2374, I-2382, I-2388, I-2396, I-2407, I-2430, I-2432, I-2458, I-2460, I-2468, I-2471, I-2473

**TRANS 22 Comment:** All public lands should remain open for all people in all forms of transportation.

Comment Letter: I-2179, I-2193, I-2208, I-2537, I-2654

**TRANS 23 Comment:** To minimize abuse: develop marked & groomed trials, provide adequate maps, provide adequate law enforcement.

Comment Letter: I-2218, I-2228, I-2542, I-2682

**TRANS 24 Comment:** Implement speed limits on trails, one way routes, more non-motorized trails, alternate use days, and implement a permit only system in busy areas.

Comment Letter: I-2223, I-2224

**TRANS 25 Comment:** Educational signs should be posted along routes including—slow down when passing, crushing veg. Causes airborn dust, multi-usesigning, speed limit.

Comment Letter: I-2224, I-2545, I-2550, I-2570, I-2578

**TRANS 26 Comment:** All RS2477 claims for right-of-way be treated with the utmost discretion in determining which will be granted to protect scenic landscapes & wildlife habitat.

Comment Letter: I-2266

**TRANS 27 Comment:** New trails should be developed to replace those that have been closed by new private owners.

Comment Letter: I-2241, I-2242, I-2276, I-2295, I-2352, I-2355, I-2383, I-2452, I-2648

**TRANS 28 Comment:** Off trail travel should be limited to people on foot.

Comment Letter: I-2299

**TRANS 29 Comment:** No new road or trail construction or maintenance in Bridger Jack WSA, Lime Ridge, or Cedar Mesa.

**TRANS 30 Comment:** Many areas exist where OHV travel does no harm-therefore, it need not be restricted & thus open access should be allowed.

Comment Letter: I-2327

**TRANS 31 Comment:** To prevent further creation of unauthorized by passes by the uneducated, all markings & signs on the trails should clearly originate from the BLM.

Comment Letter: I-2352, I-2452, I-2682

**TRANS 32 Comment:** Instruction for the reporting of illegal & irresponsible behavior should be posted at the beginning and end of each trail.

Comment Letter: I-2352, I-2452

**TRANS 33 Comment:** Motorized use should be stopped at designated parking areas along the loop road & have some trails/roads designated for non-motorized use.

Comment Letter: I-2385

**TRANS 34 Comment:** Duplicate roads & other areas that have been damaged require revegetation.

Comment Letter: I-2244, I-2385, I-2505

**TRANS 35 Comment:** Keep airstrips open for small airplanes.

Comment Letter: I-2386

**TRANS 36 Comment:** Any route established by ORV's in the last 10 years should be closed & rehabilitated. There is no reasonable way to control proliforation of routes created by ORV's.

Comment Letter: I-2392

**TRANS 37 Comment:** The definition of 'road' should be limited to well-established two-track routes navigable by standard 4-wheel drive and existing before 10 years ago.

Comment Letter: I-2392

**TRANS 38 Comment:** No new trails for ORV use.

Comment Letter: I-2392, I-2417

**TRANS 39 Comment:** Planning process needs to carefully consider all the routes & the access they provide rather than blanket closures to reduce road miles or create artificial roadless areas.

Comment Letter: I-2404, I-2409

**TRANS 40 Comment:** Roads are valued recreational, infrastructure are not a burden to be eliminated.

Comment Letter: I-2492

**TRANS 41Comment:** The scenic highway corridor ACEG should be expanded. State Hwy. 3/6 which goes to Grosenecks State Park was not included in the ACEG. Since this is a state highway going to a state park, the views along it would be protected.

Comment Letter: I-2521, I-2527

**TRANS 42 Comment:** RS 2477 should end. If road claims are not damaged in 3 years they are gone.

Comment Letter: I-2571

**TRANS 43 Comment:** See list of trails and proposed uses.

Comment Letter: I-2484

**TRANS 44 Comment:** See I-2601 for list of specific roads and trails that must be kept open.

Comment Letter: I-2601

### **Vegetation**

**VEG 1 Comment:** We would encourage BLM to consider expanding yor program for exotic species control.

Comment Letter: G-0001

**VEG 2 Comment:** Recent burn areas, such as the Goose Ilsand area along the Colorado River, may offer some potential for restoration with continuing treatment.

Comment Letter: G-0001,I-2263

**VEG 3 Comment:** There is no basis in law for developing "vegetation management objectives". The criteria should state "utilizing the principle of multiple use, formulate and consider reasonable alternatives" and should quote extensively form FLPMA section 202c.

Comment Letter: O-0013

**VEG 4 Comment:** If BLM does not rescind the criteria, BLM should imediately provide a definition of "vegetation management objective" in all planning documents.

**VEG 5 Comment:** Criteria should be developed publicly and open for early public comment and review.

Comment Letter: O-0013

**VEG 6 Comment:** Surface disturbing activities must not be allowed in threatened, endangered or sensitive plant species habitat.

Comment Letter: O-0027

**VEG 7 Comment:** These areas must be targeted for noxious weed control activities.

Comment Letter: O-0027

**VEG 8 Comment:** Areas with threatened, endangered, or sensitive plants must be excluded from fuelwood cutting areas.

Comment Letter: O-0027

**VEG 9 Comment:** BLM must review grazing allotments and address the protection of areas with threatened, endangered, or sensitive plant species.

Comment Letter: O-0027

**VEG 10 Comment:** Communication sites, utility ROWs and road ROWs must not be permitted in known special status species populations.

Comment Letter: O-0027

**VEG 11 Comment:** Reseeding or surface disturbing restoration after fires must not be allowed in areas with special status plant species, as the natural diversity and vegetation structure must be allowed to provide regeneration.

Comment Letter: O-0027

**VEG 12 Comment:** BLM must survey the planning area to document all "relict plant" communities-areas that have persisted despite the warming and drying of the interior west.

Comment Letter: O-0027

**VEG 13 Comment:** Relic and hanging gardens must be managed from their complete protection; surface distrubing or other activities that could affect these communities must not be allowed.

**VEG 14 Comment:** BLM must prohibit methods and projects that do no achieve restoration or that irreversibly impact other resources in the planning area.

Comment Letter: O-0027

**VEG 15 Comment:** Chaining, roller chopping, or similar methods must be prohibited.

Comment Letter: O-0027

**VEG 16 Comment:** Livestock must be excluded from a restoration/revegetation site for enough time to document that the restoration is successful and that there will be no impact from lievstock grazing in the area.

Comment Letter: O-0027

**VEG 17 Comment:** Although control of noxious weed species is a priority, chemical treatments of noxious weed species should be used only if damage to other resources is the area is significant, imminent and cerain, and then only with specific application.

Comment Letter: O-0027

**VEG 18 Comment:** BLM must prioritize areas for which fire could improve the vegetation communities and then allow natural fires to burn in these areas.

Comment Letter: O-0027

**VEG 19 Comment:** BLM must establish monitoring plots to determine the effectiveness fo the treatments used for invasive plant control and to provide baseline data of overall change in conditions.

Comment Letter: O-0027, I-2561

**VEG 20 Comment:** Fuelwood harvesting must not be allowed outside of already disturbed areas.

Comment Letter: O-0027

**VEG 21 Comment:** Maintain the trails to minimize trampling of vegetation.

Comment Letter: I-2263, I-2649, I-2682

**VEG 22 Comment:** Consider collaborative management & list management techniques to involve species.

#### **Water Resources**

**WR 1 Comment:** Watershed management practices are important and should control vegetation that decreases or impairs long-term water quality or quantity to avoid jeopardy to Utah State water rights.

Comment Letter: G-0005

**WR 2 Comment:** BLM held water rights that may no longer be needed for grazing could be converted to use by wildlife after an appropriate proceeding to change the water right in the offic of State Engineer.

Comment Letter: O-0005

**WR 3 Comment:** Any minerals development projects propsed for critical watershed areas should go through NEPA process and only be permitted if it can be shown that no impairment of the water resource (quality or quantity) will occur with the development.

Comment Letter: O-0005

**WR 4 Comment:** Water quality monitoring should be implemented when ground disturbing activities could be adversely affect the resouce and mitigation should be required in that case.

Comment Letter: O-0005

**WR 5 Comment:** New recreation facilities should be prohibited in riparian areas except for small signs for resource protection.

Comment Letter: O-0005

**WR 6 Comment:** Livestock should be removed from riparian areas.

Comment Letter: O-0005, I-0001 to I-0744, I-0746 to I-0948, I-0950 to I-0956, I-0958 to I-0994, I-0996 to I-1027, I-1029 to I-1164, I-1166 to I-1197, I-1199 to I-1257, I-1259 to 1296, I-2160, I-2166, I-2222, I-2237, I-2239, I-2261, -2262, I-2278, I-2284, I-2288, I-2292, I-2294, I-2299, I-2302, I-2308, I-2315, I-2322, I-2335, I-2358, I-2362, I-2365, I-2372, I-2395, I-2398, I-2412, I-2438, I-2444, I-2470, I-2484, I-2491, I-2496, I-2503, I-2510, I-2512, I-2524, I-2526, I-2527, I-2532, I-2541, I-2545, I-2547, I-2561, I-2569-2571, I-2573, I-2578, I-2581, I-2594, I-2597, I-2612, I-2626, I-2627, I-2634, I-2650, I-2659, I-2660, I-2663, I-2676, I-2680

**WR 7** Comment: If water developments are constructed such as troughs, pumps, pipelines, impoundments, in order toremove livestock from riparian areas, construction should not cause reduced flow rates of the water source or dewatering of springs.

**WR 8 Comment:** The cornerstone to effective protection of riparian areas is the completion of a comprehensive inventory of the riparian and wetlands resources within the bounds of the RMP area.

Comment Letter: O-0027, I-2166, I-2304, I-2305

**WR 9 Comment:** Exclusion of off-road vehicles form riparian areas and wetlands, or lands outside of such areas where vehicle use may impact such areas.

Comment Letter: O-0027, I-2205, I-2238, I-2284, I-2305, I-2350, I-2470, I-2484, I-2518, I-2527, I-2545, I-2582, I-2631, I-2641, I-2682

**WR 10 Comment:** Incorporation of riparian and wetland area protection of the associated watersheds.

Comment Letter: O-0027, I-2658

**WR 11 Comment:** Exclusion of cattle and sheep from riparian and wetland areas, or lands outside of such areas where domestic grazing may impact such areas.

Comment Letter: O-0027

**WR 12 Comment:** Development of an effective monitoring program that would measure biodiversity and wildlife populations.

Comment Letter: O-0027, I-2649

**WR 13 Comment:** An explanation of how mineral development and associated impacts such as waste pits, roads, pipelines and other uses, will be regulated so as to avoid impacts to riparian areas and wetlands.

Comment Letter: O-0027

**WR 14 Comment:** A prohibition on the issuance of ROW in riparian and wetlands areas, or in lands outside of such areas where ROW use would adversely impact riparian areas.

Comment Letter: O-0027

**WR 15 Comment:** Identify for acquisition lands in private, state or local government ownership within riparian or wetland areas that are ecologically, hydrologically, or geologically linked to BLM wetlands.

Comment Letter: O-0027

**WR 16 Comment:** Riparian areas should be fenced off. People should be educated & off highway roads changed not to ruin these areas.

**WR 17 Comment:** Water diversion from the San Juan River should not be permitted.

Comment Letter: I-2316

**WR 18 Comment:** With respect to riparian ecosystems, it is important to recognize that proper functioning condition (PFC) alone as an insufficient description of desired conditions for riparian ecosystems. I also recommend that BLM consider augmenting the standard approach for conducting PFC assessments to include indicators, which enable BLM to access riparian habitat conditions in addition to the prerequisite functioning of hydrologic processes.

Comment Letter: I-2454

**WR 19 Comment:** Where riparian areas have been degraded by grazing, motorized use, or excessive non-motorized camping, should be closed.

Comment Letter: I-2505

**WR 20 Comment:** "Guzzlers" should be discouraged unless needed for recovery of a special status species, and prohibited if intended to benefit any introduced, non-native species.

Comment Letter: I-2573

**WR 21 Comment:** RMP should place the highest importance on riparian areas. If we don't they will be lost forever.

Comment Letter: I-2305

### Wilderness

**WDNS 1 Comment:** BLM should emphasize the importance of wilderness values and manage ares with such qualities to maintain these values.

Comment Letter: O-0006, I-2222, I-2312

**WDNS 2 Comment:** The BLM should ensure the maintenance of roadless areas within the SE Utah RMP areas so these areas may, if appropriate, become designated as wilderness areas by statute.

Comment Letter: O-0006

**WDNS 3 Comment:** BLM must make all "new information regarding wilderness characteristics" available for public review and comment prior to utilizing such information to develop draft alternatives.

**WDNS 4 Comment:** BLM should supplement with an inventory of other resource values and uses in each "wilderness inventory unit" that inventory should include, but not be limited to, inventory of motorized and mechanized recreational values and opportunities, inventory of landing strips, inventory of ranglenad improvements(stock ponds, fences, cattle guards, ect) and inventory of lands with MD potential.

Comment Letter: O-0013

**WDNS 5 Comment:** To comply with NEPA, which requires a reasonable range of alternatives, we believe the alternatives in the draft plan and EIS must include condsideration for WSA status of all the lands found to have wilderness caharacteristics by BLM in any of its wilderness incentories, or proposed for wilderness by members of Congress in America's Redrock Wilderness Act

Comment Letter: O-0017

**WDNS 6 Comment:** Wild places in southern Utah are fragile. Please protect their eternal power to inspire.

Comment Letter: I-2170

**WDNS 7 Comment:** BLM needs to balance the need for recreation facilities for ORV users with preserving wilderness areas.

Comment Letter: I-2175

**WDNS 8 Comment:** BLM must consider all lands for wilderness and manage these lands for protection of these resources.

Comment Letter: I-2239, I-2387

**WDNS 9 Comment:** Rehabilitating landscapes that have been degrated should be part of the RMP.

Comment Letter: I-2358, I-2387, I-2631

#### **Wildlife**

**WDLF 1 Comment:** We would encourage that mangement of important habitat near NPS units consider wildlife values.

Comment Letter: G-0001, I-2198

**WDLF 2 Comment:** We would support the inclusion of provisions for bighorn sheep conservation in the new RMP.

**WDLF 3 Comment:** BLM should place a priority on protecting riparian and water resources as they relate to fish and wildlife.

Comment Letter: O-0005

**WDLF 4 Comment:** RMP must recognize the Utah Dept of Wildlifes responsibility to manage wildlife on BLM-managed lands.

Comment Letter: O-0013

**WDLF 5 Comment:** Utah FNAWS requests the BLM to sepcifically protect bighorn sheep herds in the following areas within these two RMP areas: Rattlesnake herd, Professor Valley herd, Potash herd, North San Juan Herd, South San Juan herd, and the Dolores Triangle herd-managed in conjuction w/ the Colorado DOW.

Comment Letter: O-0021

**WDLF 6 Comment:** Manage for a sufficient feed water and unfragmented habitat to maintain a healthy wildlife population.

Comment Letter: I-2358, I-2438

**WDLF 7 Comment:** The EIS should discuss the falue of the riparian zones for migrant birds that use these strips of green habitat as their corridors to migrate north in the spring across the arid southern Utah region. This value may have been underappreciated in the past, but it should be considered in all BLM planning. I-? Before 2585, but after 2457

Comment Letter: I-2541

**WDLF 8 Comment:** We suggest that you fairly qualify and quantify all wildlife impacts based on scientific data and not just the biases of some biologist who would like to see ATV use go away.

Comment Letter: I-2585

**WDLF 9 Comment:** Need to reduce road density to recover repressed game populations. Roadless areas are key to mammal conservation.